2012-2014 DR Application Alternate PD

Sidney Dietz PG&E

January 11, 2012





Summary

Proposed Changes For Alternate PD

The cost-effectiveness analysis should use PG&E's LOLP model and the analysis should be performed on a portfolio basis.

Programs and budgets should then be restored, as appropriate

AMP contracts should be extended by 1 year and PG&E should be allowed to do additional extensions and a new RFP

Dual participation should maintain the existing rules, with the addition of a prohibition on dual participation across DR providers

Important Items To Maintain In The Alternate PD

No additional requirements to bid as PDR and a new proceeding to address market integration issues

No cap on the per customer marketing costs for SmartAC



Cost Effectiveness

The alternate PD cost effectiveness analysis should utilize PG&E's loss of load probability (LOLP) model

Cost effectiveness should be judged on a portfolio basis.

The alternate should remove the sliding scale for costeffectiveness as inconsistent with Commission precedent and the standard practice manual.

The TRC should be the primary test considered, including for PLS.

Programs and budgets should be restored that are now cost effective (See attached sheet)



Status of AMP Contracts

Current contracts ended as of December 31, 2011

One-year contract extensions were filed with DR application and become effective on a final CPUC decision.

The Alternate PD should:

Allow additional AMP amendments for 2013

Approve a new RFP that would bid two ways to obtain the best value for ratepayers: (1) with the aggregator bidding the load reduction; and (2) with PG&E bidding the load reduction.



Dual Participation

The alternate PD should approve the existing dual participation rules, with the following two changes:

- A customer may not simultaneously enroll in DR programs offered by multiple DR providers to be consistent with the CAISO's proposed rules;
- 2. Dual participation should be limited to one emergency-triggered program and one price-responsive program.

(See Ex. PGE 8, pp. 2-5 to 2-8 (PG&E/Ur))

The alternate PD should allow SmartAC dual participating with dynamic rates and also allow DBP to dual participate with BIP



Marketing Budget Approach

PG&E's Portfolio approach was initially prompted by guidance from the Commission

In D.09-08-027, the CPUC requested that, "utilities move towards more coordinated marketing, education and outreach, and reduce or eliminate such program-specific budget requests for the 2012-2014 period." (D.09-08-027, p. 96.)

PG&E's customer research findings reinforced a consultative and portfolio-based approach

Large C&I and agricultural customers who receive live person support are more likely to sign up and perform better on event days.

PG&E agrees with a portfolio approach to DR Marketing Education and Outreach because it is more customer-focused and provides PG&E with greater flexibility to optimize marketing activities based on customer response, program performance, and other factors



Other Items

PG&E should be able to operate PeakChoice in 2012 and then close the program. The Commission should not require 50% unenrollment of customers (p.129)

PG&E should be able to enroll new SMB customers in SmartAC (combined program is cost-effective). (p.126)

For cost recovery, PG&E should record costs in DRAM not DREBA (page 216, line 12).

PG&E should not be required to collect air quality compliance data from its customers to check to see if they are meeting permitting requirements. This is for CARB and local air quality management districts. (p. 114).

Thank You

Sid Dietz



	Total Requested for	1	Authorized per		Request for			
Funding Categories	2012-2014		Revised PD		Alternate PD			Change from Revised PD
Category 1 - Reliability-Based & Emergency Programs								
Base Interruptible Program (BIP)	\$ 666,349	\$	666,349	\$	666,349	\$	-	
Optional Binding Mandatory Curtailment/Scheduled Load								
Reduction (OBMC/SLRP)	\$ 413,532	\$	413,532	\$	413,532	\$	-	
Category 1 Total	\$ 1,079,881			\$	1,079,881		-	
Category 2 - Price Response Programs								
Demand Bidding Program (DBP)	\$ -	\$	3,216,000	\$	3,216,000	\$	~	
					and the same			Reduction no longer needed to make CBP
Capacity Sidding Program (CSP)	\$ 11,563,486							cost-effective. Amount needed to transition customers on to
Peak Choice		8	1,780,000		1 911 001	\$	(161,691)	other DR programs (PG&E or otherwise).
Peak Choice with DBP	\$ 10,500,921	\$	~	\$	-	\$	-	PG&E should be able to enroll new SMB
								customers – combined program is cost-
AC Cycling Small AC	\$ 24,964,094		19,363,336		24,994,094		(5:640.759)	effective.
Category 2 Total	\$ 47,058,500	\$	34,662,155	\$	41,684,670	\$	(7,022,515)	
Category 3 - DR Service Provider (Aggregators) Managed Programs								
AMP	\$ 1,187,710	\$	1,187,710	\$	1,187,710	\$	-	
Business Energy Coalition (BEC) - 2009 Only	\$ -	\$	÷	\$	-	\$	=	
Category 3 Total	\$ 1,187,710		1,187,710	\$	1,187,710	\$	-	:
Category 4 - Emerging & Enabling Technologies								
Category 4 - Emerging & Enabling Technologies AutoDR	\$ 26,297,459	\$	26,297,459	\$	26,297,459	\$	-	
DR Emerging Technology	\$ 3,749,238	\$	3,749,238	\$	3,749,238	\$		
Category 4 Total	\$ 30,046,697	\$	30,046,697	\$	30,046,697	\$	-	
Category 5 – Pilots								
IRR Phase 2	\$ 2,458,336		2,458,336		2,458,336		-	
T&D DR PHEV/EV (incl. HAN-EV)	\$ 2,458,336 \$ 3,000,000		2,458,336 3,000,000		2,458,336 3,000,000		-	
2009-2011 Pilots	\$ -	\$		\$	-	\$	-	
Category 5 Total	\$ 7,916,672	\$	7,916,672	\$	7,916,672	\$	-	-
Category 6 - Evaluation, Measurement, and Verification								
DRMEC	\$ 15,720,981		14,520,981		14,520,981		=	
DR Research Studies Category 6 Total	\$ - \$ 15,720,981	\$	1,200,000 15,720,981		1,200,000 15,720,981		-	
Guiogory o Total	Ψ (0,720,801	φ	15,720,501	Ψ	10,720,501	Ψ	-	
Category 7 - Marketing, Education, and Outreach	A 0.270.510	_	0 470 510		60 470 510	^		
Statewide Marketing DR Care Marketing & Gubeach	\$ 2,172,510	Ų.	2,172,510		\$2,172,510		(5.876.38)	SmartAC ME&O budget restored.
Education and Training	\$ 771,993		771,993		\$771,993	\$	-	
Category 7 Total	\$ 27,523,695	\$	15,234,099	\$	19,112,456	\$	(3,878,357)	
Category 8 - DR System Support Activities								
InterAct/DR Forecasting Tool	\$ 14,407,887	\$	14,407,887	\$	14,407,887	\$	-	le i e e e e e e e e e e e e e e e e e e
DR Enrollment & Support	\$ 15,757,400	ė.	11,824,001		15,787,400			Reduction no longer needed to make BIP cost- effective.
Notifications	\$ 11,327,715	\$	7,427,715	\$	7,427,715	\$	-	·
DR Integration Policy & Planning	\$ 3,893,342		3,893,342	-	3,893,342		(0.000.000)	1
Category 8 Total	\$ 45,416,344	Э	37,552,945	Ф	41,516,344	Ф	(3,963,399)	
Category 9 - Integrated Programs and Activities (Including TA)				_				
Technology Incentives (TI) PEAK	\$ 7,089,939 \$ 1,119,659		3,538,000 560,000		3,538,000 560,000		=	
Integrated Marketing & Outreach	\$ 608,510		304,500		304,500		-	
Integrated Education & Training	\$ 121,702	\$	61,000	\$	61,000	\$	-	
Integrated Sales Training Integrated Energy Audits	\$ 152,128 \$ 2,528,037		76,000 1,264,000		76,000 1,264,000		-	
Integrated Emerging Technology	\$ 879,661		440,000		440,000		=	
IDSM Clearinghouse	\$ -	\$		\$	-	\$	-	:
Category 9 Total	\$ 12,499,636	\$	6,243,500	25	6,243,500	\$	-	
Category 10 - Special Projects								
DR-HAN Integration (excl. HAN-EV)	\$ 30,716,000 \$ 15,129,846		20,020,000 25,000,000	\$	20,020,000		-	
Permanent Load Shifting (PLS) Category 10 Total	\$ 15,129,846 \$ 45,845,846		45,020,000		25,000,000 45,020,000		-	:
TOTAL DR Portfolio	\$ 234,295,962	\$	194,664,640	\$	209,528,911	\$	(14,864,271)	