

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the
Commission’s Own Motion to Conduct a
Comprehensive Examination of Investor
Owned Electric Utilities Residential Rate
Structure, the Transition to Time Varying and
Dynamic Rates and Other Statutory
Obligations

Rulemaking 12-06-013
(Filed June 21, 2012)

**OPENING COMMENTS OF THE CONSUMER FEDERATION OF CALIFORNIA ON
THE ADMINISTRATIVE LAW JUDGE’S RULING INVITING COMMENTS.**

I. Introduction

Pursuant to the Administrative Law Judge’s November 6, 2012 Ruling (“Ruling”), Consumer Federation of California (“CFC”) respectfully submits these opening comments responding to Coordination questions.

II. Background

The Ruling directs parties to respond to a set of coordinating questions that were agreed upon by parties in a separate set of comments. CFC responds to the following questions, reserving the respond to issues raised in other questions as the proceeding unfolds:

1. Please list the major energy proceedings with which this proceeding should coordinate and explain what kind of coordination is needed (actively coordinating, relying on findings, incorporating evidentiary record, monitoring).
2. How should customer outreach and education efforts in different proceedings be coordinated to maximize effectiveness and efficiency?
3. Is it more appropriate to address certain rate design issues in other proceedings? If so, explain which proceedings are best equipped to explore and resolve specific issues.

III. Discussion

Question: Please list the major energy proceedings with which this proceeding should coordinate and explain what kind of coordination is needed (actively coordinating, relying on findings, incorporating evidentiary record, monitoring)?

The OIR addressed the need to coordinate with various proceedings in order to create consistent policies across the three IOUs to support a transition to time-variant and dynamic pricing. One of the primary goals that the Commission should maintain when coordinating with other proceedings is developing consistent policies that support affordable and equitable rates for utility customers. This is why CFC feels that in addition to coordinating with other proceedings, the Commission should also actively incorporate the annual streamlined report required by §748 of the Public Utilities Code that addresses limiting increases to utility rates as well as costs.

There are two significant proceedings that directly mention the need for an alternative rate structure in order for certain energy policies and programs related to the proceeding to be effective. These proceedings include R09-08-009 (Alternative fueled vehicles) and R.10-12-007 (Energy Storage). CFC feels that at a minimum these cases should be monitored when examining residential rate structures in the instant proceeding.

Additionally, IOU Applications and General Rate Cases (GRCs) actively develop policies and budget/cost allocation for time-varying rates/dynamic pricing in their respective territories and therefore should involve more active coordination and incorporation of evidentiary record.

Finally, there are cases that address energy efficiency policies and meeting statewide energy goals such as R. 09-11-014, which are important when examining residential rate design.

CFC feels that proceedings such as R. 09-11-014 should be monitored as this proceeding continues.

Question: How should customer outreach and education efforts in different proceedings be coordinated to maximize effectiveness and efficiency?

To the extent possible, the Commission should look into possibly consolidating portions of proceedings that directly address customer outreach and education efforts. This can be done by creating a phase within this proceeding that focuses primarily on customer outreach and education efforts and using this platform to develop a consistent, standard policy for outreach and education that will apply to all IOUs.

Question: Is it more appropriate to address certain rate design issues in other proceedings? If so, explain which proceedings are best equipped to explore and resolve specific issues.

No. CFC feels that a neutral, streamlined proceeding like the instant proceedings is the best possible forum to address certain rate design issues, develop consistent standards and policies, that will apply to all IOUs, and increase transparency instead of dealing with the issues piecemeal in separate proceedings.

Dated: November 20, 2012

Respectfully submitted,

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