

**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 Structures,  
the Transition to Time Varying and Dynamic  
Rates, and Other Statutory Obligations

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

**REPLY COMMENTS OF  
THE CALIFORNIA LARGE ENERGY CONSUMERS ASSOCIATION**

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February 28, 2013

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The California Large Energy Consumers Association (CLECA)<sup>1</sup> submits these reply comments in response to the Administrative Law Judges' January 31, 2013 Ruling on Workshops (Workshop Ruling).

**I. REPLY**

CLECA, along with a few other parties, proposed edits to some of the definitions in the Workshop Ruling. CLECA supports the proposed edits to the definitions submitted by Southern California Edison Company (SCE), and responds to the comments of TURN and DRA.

In connection with the definition of "Fixed Charges", TURN proposes a listing of certain customer charges for the four respondent IOUs.<sup>2</sup> There are two potential issues with this "list." First, a list of current charges is not a substantive definition. Second, TURN's proposal disregards the quantitatively different fixed

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<sup>1</sup> The California Large Energy Consumers Association is an *ad hoc* organization of large, high load factor industrial electric customers of Southern California Edison Company and Pacific Gas and Electric Company. CLECA has been an active participant in Commission regulatory proceedings since 1987.

<sup>2</sup> TURN Comments at 1 ("it might be instructive to actually provide information regarding the present customer charges in place for gas and electric service for the four major energy IOUs.")

customer charges applicable to residential customers served by other utilities (e.g., SMUD, water utilities). Examples should not be one-sided. Should the Commission approve TURN's proposal to provide examples of applicable fixed charges, the list should capture not just the four respondent IOUs, but also other California utilities with different fixed customer charges.

In connection with DRA's comments, we note that DRA digresses from pure definition by raising issues related to differing positions of parties regarding marginal costs. While we do not deny that such differences exist, they go beyond the definition of such terms as "cross-subsidy" to argument as to whether current marginal costs should be less averaged. CLECA submits that this is not a matter for this round of comments but rather for DRA's rate design proposal in this proceeding.

## **II. CONCLUSION**

CLECA requests that these reply comments be considered along with its initial comments. All of the recommended revisions by CLECA and SCE to the definitions, as well as CLECA's proposed new definitions, should be accepted in the final list of definitions.

Respectfully submitted,



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February 28, 2013