From: Aram Shumavon [mailto:a.shumavon@d-e-c-a.org]
Sent: Friday, March 01, 2013 4:42 PM
To: carlierfrancois@yahoo.fr; jack.clark@energycenter.org; jim@jimlazar.com; Joelle.Steward@PacifiCorp.com; jleslie@McKennaLong.com; Nick.Pappas@asm.ca.gov; sephra.ninow@energycenter.org; spauker@wsgr.com; stephaniec@greenlining.org; susannah@votesolar.org; timothy.treadwell@energycenter.org; dwtcpucdockets@dwt.com; mrw@mrwassoc.com; dmarcus2@sbcglobal.net; filings@a-klaw.com; siobhan.foley@energycenter.org; terry.clapham@energycenter.org; nbrockway@aol.com; dan.delurey@drsgcoalition.org; kkiener@solarelectricpower.org; paul.pietsch@drsgcoalition.org; rick@votesolar.org; case.admin@sce.com; Fadia.Khoury@sce.com; russell.garwacki@sce.com; liddell@energyattorney.com; Central Files; York, Jamie K; Fang, Cynthia; eric.wright@bves.com; jeannetteo@moval.org; markw@corchurch.org; mtierney-lloyd@enernoc.com; alewis@naacoalition.org; cathy.zhang@soundofhope.org; robertgnaizda@gmail.com; sswaroop@naacoalition.org; ed@temix.com; sue.mara@RTOadvisors.com; mdjoseph@adamsbroadwell.com; sdalal@sfwater.org; joshbode@fscgroup.com
Subject: R1206013 - DECA recommended changes to the bill impact calculators

DECA comments here narrowly on the subject of being able to apply functions such as minimum bills, demand charges, or similar recurring monthly fees only after a trigger condition has been met.

While this trigger condition should be applied in such a way that it is modular, DECA is particularly interested in the ability to exclude the application of such fees based on an algorithmic assessment of the shape and magnitude of an individual customer's monthly load profile. DECA proposes that the algorithm be adjustable, but for benchmarking purposes it be based on the percentage of a customer's monthly average load during the coincident peak and coincident valley as compared to the peak and valley of their customer class. In particular DECA proposes capturing customers who use 50% less on peak power and 50% more on valley power for purposes of avoiding these charges.

As a clarification DECA is suggesting that the bill impact models should be able to reflect a possible rate structure that says generally "If a customer's net load reflects a significant reduction in contribution to coincident peak or similarly contributes to a more stable baseload by having shifted their load to the hours of the diurnal load valley, there should be a vehicle for reducing or eliminating connection fees as a result of their net contribution to the efficient operation of the grid."

DECA's continues to support the changes previously raised in comments including on the various web conferences and phone calls, but does not detail them again here.

This email has been sent to the service list in pieces and so not all parties are reflected in the "to:" field above. I apologize for the inconvenience.

Aram Shumavon
D E C A - Distributed Energy Consumer Advocates
m - 415.377.2581
o - 213.784.2507