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Bcc:

Subject: R.12-06-013 -- Request for 2-week extension for submitting rate design proposals

ALJs McKinney and Sullivan,

TURN requests a two-week extension in the date for submitting residential rate design proposals. Under the current schedule, proposals are due on May 15th. TURN renews its original request (submitted March 27) that the date be changed to May 29th.

Our request is driven by two factors -- first, TURN has experienced unexpected challenges using the bill calculator models provided by the utilities. While we are in the process of overcoming these challenges, we do not expect to be able to run our preferred rate designs for all three utilities, analyze the results and provide responses to all the relevant questions prior to May 15th. Second, the consultants and staff being used by TURN in this proceeding have been facing significant demands on their time relating to work in other CPUC proceedings including the PG&E GRC Phase 1 (A.12-11-009, testimony due May 17th), the SONGS OII (I.12-10-013, evidentiary hearings May 13-17), the San Bruno pipeline investigations (I.12-01-007/I.11-02-016/I.11-11-009, combined brief due May 6th). As a result of these factors, the May 15th date makes it virtually impossible for

TURN to submit a proposal of the quality that this proceeding warrants.

On March 27, TURN originally requested a delay of the submission date to May 29. In response, the date was extended from May 1 to May 15th. In the email authorizing a 2-week delay, ALJ McKinney acknowledged "the difficulties working with the bill calculators" and noted that TURN could renew our request for the full month extension based on challenges faced in the preparation of our rate design proposals. Although TURN has done its best to meet the May 15th date, we continue to believe that our original request is needed to allow for a complete submission. TURN therefore renews our original request (which is enclosed).

We appreciate that all parties have been working diligently towards the May 15th submission date. We also appreciate any flexibility the Commission can provide given the difficult circumstances.

Matthew Freedman
Staff Attorney
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> Sent: Wednesday, March 27, 2013 7:43 AM
> Subject: R.12-06-013: Request for Extension of Schedule for Proposals and Comments
>
> Honorable ALJ Sullivan and ALJ McKinney:
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> Pursuant to Rule 11.6 the Utility Reform Network (TURN) requests a one-month extension of the current schedule for proposals (May 1, 2013) and comments (June 3 and June 17, 2013) concerning residential rate design as established in the March 19, 2013 ALJ Ruling. This proceeding offers a rare opportunity for the Commission and interested stakeholders to take the time to "do it right," rather than just do it fast. A one-month extension is necessary to actually use the bill calculators and other analyses.
>
> In the Scoping Memo issued on November 26, 2012, President Peevey originally forecast that a Ruling requesting rate design proposals would issue in April 2013, and rate design proposals would be due in May 2013. The Scoping Memo indicated a desire to use "a well-designed bill impact calculator" (page 11) and not to rush the process. Given delays in developing the bill calculator models, TURN was surprised to see that the March 19th Ruling set a May 1 deadline for proposals. The utilities and multiple intervenors have worked hard to evaluate and improve the bill calculators. Parties held workshops, meetings and webinars on multiple occasions, including on December 5-6, December 18, January 8, February 21 and February 22. TURN has used preliminary versions of the bill calculator and offered feedback to the IOUs on ways to improve the bill calculator. The IOUs provided updated models on March 11, 2013, though links to the final updated bill calculators were distributed by the three IOUs only on March 21 and 22 (after the issuance of the ALJ Ruling).
>
> TURN does not fault the IOUs for any delay in finalizing the bill calculators. The bill calculator is a complex tool. The utilities have done much to create a spreadsheet program for modeling multiple rate designs. As anyone who has participated in a rate design proceeding knows well, even running multiple alternatives using one rate design is challenging. Running the model on a PC takes significant computing power and time to perform just one simulation.
>
> TURN takes seriously the Commission's apparent intent to revisit residential rate design. Although the bill calculator is quite capable of testing new TOU rate structures, it may not be able to accommodate significant reforms to the tiered rate structure that were identified by TURN during the development of the models. TURN will therefore need to work bilaterally with the utilities to obtain analyses of rate design proposals that cannot be modeled by the bill calculators.
>

> Running the bill calculators on multiple scenarios, getting analyses from the IOUs on rate designs not possible to model with the calculators, actually determining an optimal residential rate structure for CARE and non-CARE customers based on the data, answering the questions posed in the ALJ Ruling, and providing the research support as requested in the Ruling, simply cannot be done by May 1 given the other major proceedings that also require high quality participation by TURN and other intervenors during this time period. If the Commission desires serious proposals from non-utility parties that are informed by the facts – meaning the impacts on bills and usage as calculated by the bill calculators – it must allow additional time for parties to actually run the calculators and then process the results.

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> Moreover, there is no impending statutory deadline or relevant rate adjustments. TURN appreciates that residential rate reform is an urgent issue. However, many of the rate design changes considered in this proceeding will have to wait for legislative action and the filing of utility-specific applications.

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> In accordance with Rule 11.6 TURN sought agreement from representatives of most of the active parties to this extension via email sent on May 20, 2013, the day after the ALJ Ruling. The following parties support TURN's request for an extension: EDF, Sierra Club, NRDC, DRA, SDCAN, CforAT and Greenlining. The Marine Energy Authority did not oppose the request. SDG&E opposed the request. PG&E opposed any extension of the comment period, but did not oppose a two-week extension of the proposal due date. SCE indicated that it opposed any extension that would delay issuance of a proposed decision.

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> TURN requests a four-week extension (until May 29) of the due date for proposals, together with a four-week extension of the subsequent comment and reply comment schedule. TURN emphasizes the need to extend the comment schedule on a day-for-day basis. We anticipate the need to model other parties' rate designs using the bill calculator in order to effectively compare and contrast the impact of different rate design proposals. Such modeling will involve very significant effort during a period when TURN's consultants and attorneys are also involved in many other time-intensive proceedings.

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> Thank you in advance for your consideration of this request.

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> Marcel Hawiger

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