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Cc:

Bcc:

Subject: RE: R.12-06-013; TOU workshop - UCAN's 4 suggested topic areas

Dear ALJ Halligan, UCAN strongly supports having a technical workshops examining existing optional and pilot TOU programs.

UCAN's expert has reviewed a number of documents, including the SDG&E Rate Design Window application and testimony, and has identified 4 unique topic areas which we believe would be helpful to the parties if examined at the workshop:

1. Should the TOU rate have a separate Non-Coincident Peak (NCP) demand (kW) charge in addition to the energy (kWh) charges?

SDG&E's Rate Design Window Application has noted that the coincident or system peak has shifted to later in the day. Therefore, it is necessary to determine how the non-coincident or individual peak (NCP) has changed for local area distribution system planning which depends on the sum of the NCP

2. Would short or longer on-peak periods and the snapback or rebound effect cause further shifting of the system peak?

If this OIR results in moving all IOU residential customers to the default TOU rate by 2018, (i.e., for SDG&E that would be most of its customer base) the potential for a substantial rebound effect causing a shift of the system peak to the semi-peak period is certainly a possibility.

3. Instead of one set of time periods for all customers as proposed in the Rate Design Window application that track utility costs, should the utility offer a range of TOU rates with TOU periods that are better adapted to customer needs and lifestyles (in residential) and business operations (in the business sector) with prices adjusted accordingly to ensure cost recovery?

Business operations may be limited to specific hours of operation and residential customers may be subject to home business and public school schedules. Even medical issues could suggest shorter on-peak periods for those customers with certain medical conditions

4. Should the IOUs be testing the difference between customers on mandatory TOU rates versus customers on voluntary TOU rates in terms of the rate effectiveness in achieving energy efficiency and conservation objectives?

For instance, SDG&E has experience with large customers on mandatory TOU and in the Rate Design Window SDG&E is proposing moving the remaining non-residential customers to mandatory TOU rates. It may be useful to explore how customers respond to both mandatory and voluntary TOU rates.

Regarding timing, UCAN would support having this workshop in mid or late July.

Thank you,

Don Kelly

From: Halligan, Julie [mailto:julie.halligan@cpuc.ca.gov]

Sent: Tuesday, June 17, 2014 12:02 PM

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Cc: Halligan, Julie

Subject: R.12-06-013 Question to Parties Regarding Need for Technical Workshop Evaluating TOU Programs

Dear Parties to R.12-06-013,

The Energy Division requests party feed-back on whether a 1 day technical workshop on existing optional and pilot TOU programs would be useful. This workshop would consist of a series of technical expert presentations related to the design and implementation of specific optional/pilot TOU programs including programs in the IOU service territories, SMUD, APS, and any other specifically identified existing programs. Topics could include:

- 1) Load reduction measured in the optional/pilot programs.
- 2) Lessons learned, including enrollment rates, from marketing and education efforts for these optional/pilot TOU programs.
- 3) Variables that were considered in the design of these optional/pilot TOU programs.

Please provide feedback to the Service List by answering the following questions by June 27, 2014:

- 1) Would a technical workshop on existing optional/pilot TOU rates be helpful to parties in the R.12-06-013 proceeding?
- 2) If yes, are there specific technical topics or questions you believe the workshop should address?
- 3) If yes, please provide suggested date/timing for the workshop.

Thank you.

Julie Halligan

Administrative Law Judge