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Sent: 6/25/2014 10:57:16 AM

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Subject: RE: 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 requested party feed-back on whether a 1 day technical workshop on existing optional and pilot TOU programs would be useful. The Environmental Defense Fund provides the following responses to the Energy Division's three questions.

1) Would a technical workshop on existing optional/pilot TOU rates be helpful to parties in the R.12-06-013 proceeding?

EDF strongly supports the Energy Division proposal for a technical workshop.

2) If yes, are there specific technical topics or questions you believe the workshop should address?

The Energy Division proposed topics are of particular interest. EDF would also welcome these

additional topics:

- Report from CA IOU's on load impacts of the recent change to time-variant rates for small commercial customers. On this topic, experience by SCE small and large commercial customers in the SCE Preferred Resources pilot region would be particularly helpful for exploring what additional preferred resources might be available in pilot region related to tariff innovations.
- Comparison of studies of the long term benefits of residential rate reform. Bill calculators used thus far in the proceeding have held revenue requirement constant, thereby inherently prohibiting examination of the long-term system benefits, including reducing the environmental footprint of the grid.
- The basis upon which tariff characteristics (e.g., peak/off-peak differentials) are structured, and how this basis will change to meet system needs over time (e.g., ramping needs).
- Any available evidence associated with "snap-back," or additional conservation and efficiency secured.

3) If yes, please provide suggested date/timing for the workshop.

EDF requests that the workshop be as soon as possible.

On Tuesday, June 17, 2014 3:02 PM, "Halligan, Julie" <julie.halligan@cpuc.ca.gov> wrote:

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