



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Order Instituting Rulemaking Regarding Policies
and Protocols for Demand Response Load Impact
Estimates, Cost-Effectiveness Methodologies,
Megawatt Goals and Alignment with California
Independent System Operator Market Design
Protocols

Rulemaking 07-01-041
(Filed January 25, 2007)

REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY
(U 338-E) ON THE STATEWIDE JOINT IOU STUDY OF PERMANENT LOAD
SHIFTING

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Dated: **March 18, 2011**

**REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON
THE STATEWIDE JOINT IOU STUDY OF PERMANET LOAD SHIFTING**

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I.

INTRODUCTION

Pursuant to the February 11, 2011 *Administrative Law Judge's Ruling Setting Workshop On Cost Effectiveness Protocols* (Ruling), Southern California Edison Company (SCE) respectfully submits these Reply Comments on the Statewide Joint IOU Study of Permanent Load Shifting (PLS Report or Report).¹

¹ The Ruling did not set workshop dates. Rather, it ordered Parties to this proceeding to file, *inter alia*, reply comments on the PLS Report by March 18, 2011.

II. DISCUSSION

A. Transphase Misinterprets The PLS Report's Proposed Standard Offer Incentive

Transphase maintains that the PLS Report's "Table 25 proposed a six-hour standard offer incentive for Edison of \$1340 per kW . . . plus *an additional 10 cent per kWh on-peak/off-peak differential,*" and claims that such incentive "provides a very similar incentive as that proposed by Transphase."² However, Transphase's interpretation of Table 25 is inaccurate for at least two reasons.

First, SCE specifically received clarification from E3, one of the Report's authors, that Table 25's proposed TOU differential is not *in addition* to the proposed incentive, as Transphase posits; rather, the TOU differential was merely added to the Table as a means of presenting an equivalent "conversion value" for the incentive level presented on the same chart. That is, providing an additional \$0.10/kWh³ PLS load shift payment (beyond the tariff-based peak-to-off-peak rate differential) is simply an alternative means of explaining the \$1340/kW incentive.

Second, and presumably unbeknownst to Transphase at the time it filed its comments, the figures in the table Transphase relied upon for its recommendation of a \$1340/kW median incentive are incorrect. SCE noted the error in its Opening Comments.⁴ As E3 acknowledged in a letter to SCE, the winter TOU periods for the TOU-8 Option B depicted in Table 25 were entered incorrectly and the incentives for the TOU-8B rate are roughly \$100-200/kW lower. E3 has committed to modifying Table 25 to revise the TOU estimates it originally used in order to correct the error. Thus, the proposed median incentive level for the TOU-8B option is not \$1,340 per kW for the six-hour standard offer. Rather, it is \$370 per kW. The revision to Table 25, which E3 plans to submit to the Commission as an errata sheet, will look like this:

² Transphase Opening Comments, p. 6 (emphasis added).

³ Note that Table 25 in the November 29, 2010 version of the PLS Report indicates that this value is really \$0.12/kWh.

⁴ See SCE Opening Comments, p. 8.

Table 25: Equivalent Incentive - SCE TOU8B - Climate Zone 14

	2 Hour	4 Hour	6 Hour	8 Hour	10 Hour
\$/kW upfront	\$230	\$280	\$370	\$580	\$870
\$/kWh storage	\$115	\$70	\$62	\$73	\$87
Additional TOU Δ \$/kWh	\$0.06	\$0.04	\$0.03	\$0.04	\$0.05

In light of this significant change to a value mistakenly presented in the PLS Report, SCE reiterates its request that the Commission enter forthcoming errata sheets into the record.⁵

B. Rate Design Modifications Are Outside the Scope Of This Proceeding

In addition to misinterpreting Table 25 of the PLS Report, Transphase’s proposed “standard offer incentive” appears to advocate for revisions to utility tariff rates (i.e., the additional 10 cent per kWh on-peak/off-peak differential) as a means by which to “re-establish PLS as an important key to the smart grid.”⁶ In a similar vein, the California Energy Storage Alliance advocates that “[c]onsistent electric tariff structures that promote shifting of demand and consumption by providing a consistent differential between peak and off peak rates over a number of years are absolutely key to greater PLS project deployment.”⁷ However, as SCE stated in its Opening Comments,⁸ rate design modifications are squarely outside the scope of this proceeding. Moreover, to be faithful to the California Public Utilities Commission’s (Commission’s) long-standing practice, rate-design modifications should be driven by cost-based principles and should result from a careful consideration of marginal cost studies that set the appropriate rate differentials. That type of analysis and litigation is better suited to a general rate case, for example, or related proceedings.

⁵ SCE Opening Comments, p. 8.

⁶ Transphase Opening Comments, p. 6.

⁷ California Energy Storage Alliance Opening Comments, p. 7.

⁸ SCE Opening Comments, pp. 2-3.

C. The PLS Report’s Ratepayer Neutrality Test Is More Appropriate Than The Total Resource Cost Test For Measuring PLS’s Impact On Ratepayers

Transphase stands alone in criticizing, as “one major methodological question-mark,” the PLS Report’s “ratepayer neutral” approach to measuring the cost-effectiveness of PLS programs.² In particular, Transphase maintains that the ratepayer neutrality test “double counts the costs” of PLS. Transphase advocates, instead, for using the Total Resource Cost (TRC) test. However, Transphase misses the point. The TRC test effectively ignores incentives, since they are a transfer payment between participating customers (those receiving the incentive) and non-participating customers (those who pay the incentive), and cancel out when aggregated. Thus, the TRC test is simply irrelevant to the issue of how a particular PLS system impacts ratepayers, which is critical to determining the distribution of net gains or benefits of PLS. Because the ratepayer neutral test allows the Commission to analyze the difference between utility avoided cost savings and customer bill savings in order to determine whether paying an incentive for PLS applications will increase rates to other utility customers, the PLS Report uses the correct test for the purpose of investigating incentive design. It is not clear what Transphase means by suggesting that the ratepayer neutrality test “double counts” PLS costs. This test compares the avoided cost benefits from PLS (which inure to the host utility as lower costs and are then conveyed to utility customers through lower rates) with the bill savings benefits which are effectively paid to the PLS host customer and thus offset the avoided cost benefits. PLS costs are not a component of the ratepayer neutrality test.

D. The Commission Should Not Make Determinations About Alleged PLS Benefits Based Solely On The Comments On The Report

Ice Energy, Inc. includes in Appendix A of its opening comments over six single-spaced pages advocating, *inter alia*, additional alleged benefits of its PLS installations. SCE urges the Commission to refrain from drawing conclusions based on these unchecked assertions. Policy

² Transphase Opening Comments, p. 5.

recommendations about appropriate PLS incentive levels and the types of benefits included in the analysis are more appropriately addressed in testimony or hearings. Moreover, SCE reiterates that the Commission will treat energy storage issues more comprehensively in Rulemaking 10-12-007, which would be a more appropriate proceeding than this one to analyze some of the complicated cost-effectiveness issues raised in Ice Energy's comments.¹⁰

III.

CONCLUSION

SCE appreciates the opportunity to provide these Reply Comments on the PLS Report and looks forward to the Commission's entrance into the record of the relevant errata sheets by E3.

Respectfully submitted,

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March 18, 2011

¹⁰ SCE Opening Comments, p. 9.

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE STATEWIDE JOINT IOU STUDY OF PERMANENT LOAD SHIFTING** on all parties identified on the attached service list(s).

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First class mail will be used if electronic service cannot be effectuated.

Executed this **18th day of March, 2011**, at Rosemead, California.

/s/ ALEJANDRA ARZOLA

By: Alejandra Arzola

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