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*Comment Received From: Nico DeGiorgio
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Recommendation to Supplement Statutory Rate Reporting With August Peak Metrics

I submit this comment as a California ratepayer regarding statutory electric rate reporting requirements.

Assembly Bill 67 (2013) and Senate Bill 695 (2015), codified in Public Utilities Code Â§ 913.1, require the Commission to report electric rate trends using January system average rates. While this approach supports consistent year-over-year comparison, it does not reflect how customers experience peak electricity costs under modern rate designs.

For many customers, the highest effective electricity rates occur during August, when summer seasonal pricing, peak time-of-use rates, and system demand are at their highest. Because current reporting relies on January-only snapshots, it does not capture the magnitude or progression of peak-period costs borne by customers during this critical summer month. This severely underrepresents the impact of rising electricity costs to ratepayers based on how and when they are billed the most.

I respectfully recommend that the California Energy Commission, in partnership with CPUC, supplement existing statutory reporting with a system average rate for the summer month of August, to more accurately reflect peak pricing conditions and improve transparency for ratepayers and policymakers.

Source: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-costs/historical-electric-cost-data/bundled-system-average>

Thank you for the opportunity to comment.

Additional submitted attachment is included below.

Bundled System Average Rate (¢/kWh, January 1)

Utility	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
SCE	14.7	13.9	13.7	14.2	14.2	14.1	14.3	15.5	15.7	16.2	15.0	15.8	16.2	16.0	16.4	18.5	22.3	25.2	26.9
PG&E	13.8	14.0	13.7	14.4	15.4	15.1	15.3	15.7	16.3	17.2	17.8	18.8	19.2	19.6	21.5	22.6	25.1	28.6	36.6
SDG&E	13.9	14.5	13.6	16.7	16.1	16.0	15.4	16.3	18.1	20.9	20.4	21.8	24.0	23.7	24.1	24.0	31.1	38.5	31.5

Notes:

- 1) Bundled utility customers receive all services — generation, transmission, and distribution services — from the utility.
- 2) Rates for the years starting with 2013 are the rates reported in the CPUC's annual SB 695 Report, available at: <https://www.cpuc.ca.gov/about-cpuc/divisions/office-of-governmental-affairs>.

