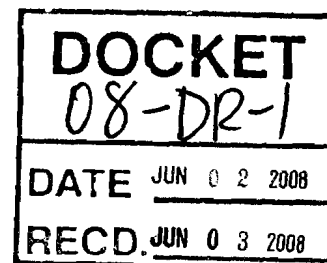


Docket Optical System - DOCKET # 2008-DR-01 Load Management / Demand Response

From: "McAvoy, Philip" <PMcAvoy@roseville.ca.us>
To: <docket@energy.state.ca.us>
Date: 6/3/2008 3:31 PM
Subject: DOCKET # 2008-DR-01 Load Management / Demand Response
CC: "McAvoy, Philip" <PMcAvoy@roseville.ca.us>

June 2, 2008

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 08-DR-01
1516 Ninth Street
Sacramento, CA 95814-5512



RE: Docket No. 08-DR-01 Load Management Standards Workshop on Advanced Metering Infrastructure

Dear Chairman Pfannenstiel and Commissioner Rosenfeld,

The City of Roseville's Electric Department respectfully submits the following comments on the Advanced Metering Infrastructure Workshop held on May 27, 2008.

The City of Roseville recently completed a business case analysis for Advanced Metering Infrastructure in August of 2007. The City of Roseville hired a consultant to assist in building a business case model and evaluating the costs and benefits of an Advanced Metering Infrastructure. After careful review of the consultant's findings and staff revisions, it was determined that full deployment of an AMI system would not be cost effective for Roseville.

Presentations at the May 27 hearing estimated that over 50% of the benefits came from meter reading savings. Roseville has already invested significant funds in automated meter reading systems. Over 28% of our electric meters and 50% of our water meters are already part of automated meter reading systems. Thus, the City only needs to employ 5 meter readers for its 82,000 water and electric meters.

While AMI can be an effective solution for select utilities, smaller utilities with compact service territories struggle to find operational savings to offset the significant capital expense of a full two-way AMI deployment. Strategic AMI deployment can have benefits for interval data collection and advanced rate design for portions of the population that wish to actively participate in load curtailment strategies. In Roseville, our largest commercial customers (representing about one-third of our peak summer load) already enjoy daily remote meter reading which provides them with internet-based graphical displays of their energy use, to help them optimize their business efficiency.

Roseville continues to monitor the AMI marketplace and will modify its business case as prices and technologies change. Roseville currently offers AMI and several other leading edge programs to reduce our peak load, including Time of Use rates for our largest commercial customers, our BEST solar homes programs (in which one-third of all new homes in the past year included PV panels), requirements and rebates for builders to exceed Title 24, and a new residential air conditioning cycling program.

Thank you for the opportunity to comment on this issue.

Sincerely,

Philip McAvoy

Rates and Customer Information Manager

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