DOCKETED	
Docket Number:	19-OIR-01
Project Title:	Load Management Rulemaking
TN #:	232329
Document Title:	Steve Uhler Comments - OIR-19-01 Marginal cost definition and enforcement
Description:	N/A
Filer:	System
Organization:	Steve Uhler
Submitter Role:	Other Interested Person
Submission Date:	3/6/2020 7:09:21 AM
Docketed Date:	3/6/2020

Comment Received From: Steve Uhler Submitted On: 3/6/2020 Docket Number: 19-OIR-01

OIR-19-01 Marginal cost definition and enforcement

OIR-19-01 Marginal cost definition and enforcement

Pursuant to Section 1621. General Provisions. (c) (7) "Marginal cost" is the change in current and committed future utility cost that is caused by a customer initiated change in electricity usage.

Pursuant to proposed Section 1623. Load Management Tariff Standard. (b) Marginal Costs and Rates. Marginal costs are defined as the cost (\$/MWh) of serving the next increment of electricity demand in the relevant load area, consistent with existing grid constraints and generators' ability to deliver energy to meet that demand.

Pursuant to proposed Section 1623. Load Management Tariff Standard. (a) This standard requires that retail electricity providers develop rates based on marginal costs, submit such rates to its rate-approving body and to the CEC, and make them publicly available for access by customers and their devices. Fixed charges, rebates, and taxes associated with electric service are not subject to this standard. The purpose of this standard is to provide granular economic signals that enable increased demand flexibility through customer automation of loads, with the goal of moving electric demand away from system load peaks, and toward times of surplus renewable power.

For a customer that does not initiate change in electricity usage, is there a change in rates associated with electric service when the marginal cost in the relevant load area changes?

For a customer that is provided service for a fixed charge for electricity service, is there a change in rates associated with electric service when the marginal cost in the relevant load area changes?

Are real-time tariffs suspended the period when the relevant load area has no surplus renewable power available for delivery to the relevant load area?

What is the effective date of proposed Section 1623. Load Management Tariff Standard. (b) (1) Retail Electricity Rates. To ensure efficient economic signals required for optimal load management, all retail electricity rates shall be based on the marginal cost of electricity, and shall recover the costs associated with the set of customers who elect that rate?

How will the Energy Commission enforce real-time tariffs and associated rates?

Steve Uhler sau@wwmpd.com