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## New B electric rate rules in conflict with Automated Demand Response

I have recently discovered that the new "B" rates for electricity, set to take effect in March 2021, will disallow any participation in utility managed Automated Demand Response programs, or ADR. These ADR programs are structured to reduce energy use precisely when there is excessive Demand on the grid, to "flatten" the Duck Curve.

By forcing all electric accounts onto the "B" rates, all ADR programs will effectively become obsolete. My recent experience in trying to do an early conversion of one of our ADR sites to the new B rate showed that these two were incompatible, and we were forced to return to the original E19 rate.

We are hoping that these two can be resolved quickly, to allow ADR programs to function with the required B rates.

Thank you.