DOCKETED

Docket Number:	21-OIR-03
Project Title:	2022 Load Management Rulemaking
TN #:	244121
Document Title:	Steve Uhler Comments - on Total Marginal Cost Shall be Calculated
Description:	N/A
Filer:	System
Organization:	Steve Uhler
Submitter Role:	Public
Submission Date:	7/19/2022 1:30:29 PM
Docketed Date:	7/19/2022

Comment Received From: Steve Uhler
Submitted On: 7/19/2022
Docket Number: 21-OIR-03

on Total Marginal Cost Shall be Calculated

Additional submitted attachment is included below.

OIR-21-03 Total marginal cost shall be calculated

Electric utility retail rate setting is a public process in the State of California.

For the purpose of illustration, attached to this document, you will find a list of balancing authority area or region hourly energy charts from Energy Information Administration's (EIA) data.

EIA codes for nearby balancing authorities are AZPS, BANC, BPAT, CEN, CISO, IID, IPCO, LDWP, NEVP, PACE, PACW, SRP, TIDC and WALC.

The charts show hourly energy from power sources found in each balancing authority area or region.

The interchange of hourly energy (import and export) between balancing authorities is shown.

Each import and export of hourly energy attaches another balancing authority to a retail customer's service area.

Pursuant to proposed 1623(A)(1), Total marginal cost shall be calculated as the sum of the marginal energy cost, the marginal capacity cost (generation, transmission, and distribution), and any other appropriate time and location dependent marginal costs, including social costs, on a time interval of no more than one hour. Energy cost computations shall reflect locational marginal cost pricing as determined by the associated balancing authority, such as the California Independent System Operator, the Balancing Authority of Northern California, or other balancing authority. Marginal capacity cost computations shall reflect the variations in the probability and value of system reliability of each component (generation, transmission, and distribution). Social cost computations shall reflect, at a minimum, the locational marginal cost of associated greenhouse gas emissions.

How are appropriate time and location dependent marginal costs determined?

How will the public be informed as to how the marginal costs will be calculated?

How do the proposed regulations preserve retail rate setting as a public process in the State of California?

Steve Uhler
sau@wwmpd.com