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Concerns about an Hourly Retail Electric Regime

<https://www.energy.ca.gov/news/2022-10/cec-adopts-standards-help-consumers-save-energy-peak-times>

While CEC is framing this as a benefit to the public, what it really means is that the energy price risk will be shifted to the Retail Electric end customers. Electric utilities and Cooperatives (SMUD) have a monopoly on their territory and ample capital that can help average out costs over time. They have tools such as long-term procurement contracts and financial hedging instruments. It's true that Retail Electric at higher income levels can buy solar + battery and make efficiency upgrades to ride through the very high evening energy rates CEC will recommend. Lower income households can continue to receive subsidies. Unfortunately, Middle Class customers may not have access to either and will pay a larger share of their household income to energy bills, which is inequitable.

During the terrible Sept 2022 heatwave, I set my thermostat to 85F but the indoor temp kept rising, and I was forced to use AC when it reached 90F. These are not mere inconveniences, as some policymakers believe. Retail Customers should not be subject to hourly rates unless these inequities can be mitigated. I'd love to have solar + battery and brand new windows, but I don't have the \$50,000 to \$75,000 it would take for those upgrades.

You're going to need to have price protections during heat storms and retail price caps. What about lowering the price floor when excess solar energy is congesting the transmission system? Will you pay the retail customers for charging EVs and using HVAC when they don't need it? This will distort the price signals you hope to achieve. Policymakers cannot replumb society telling people what they can-and-cannot do in their homes. Only energy efficiency, technology advancements in generation and energy storage can help us meet this challenge. Hourly retail electric rates will create a new crisis further setting back our climate goals. Please consider carefully.