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9/15/2018 23:00	1,572,121
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9/16/2018 2:00	1,036,221
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9/16/2018 5:00	912,305
9/16/2018 6:00	921,514
9/16/2018 7:00	1,038,258
9/16/2018 8:00	1,239,734
9/16/2018 9:00	1,425,353
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9/16/2018 12:00	2,347,917
9/16/2018 13:00	2,556,856
9/16/2018 14:00	2,701,541
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9/16/2018 16:00	2,946,606
9/16/2018 17:00	2,940,049
9/16/2018 18:00	2,833,667
9/16/2018 19:00	2,614,225
9/16/2018 20:00	2,501,692
9/16/2018 21:00	2,233,192
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9/16/2018 23:00	1,656,973
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9/26/2018 4:00	752,609
9/26/2018 5:00	772,191
9/26/2018 6:00	860,110
9/26/2018 7:00	875,982
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9/26/2018 12:00	935,665
9/26/2018 13:00	962,783
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9/27/2018 4:00	646,647
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9/27/2018 6:00	792,450
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12/31/2018 7:00	1,599,605
12/31/2018 8:00	1,703,196
12/31/2018 9:00	1,736,887
12/31/2018 10:00	1,780,506
12/31/2018 11:00	1,792,872
12/31/2018 12:00	1,756,719
12/31/2018 13:00	1,711,738
12/31/2018 14:00	1,725,726
12/31/2018 15:00	1,757,926
12/31/2018 16:00	1,891,310
12/31/2018 17:00	2,060,203
12/31/2018 18:00	1,983,230
12/31/2018 19:00	1,924,513
12/31/2018 20:00	1,873,902
12/31/2018 21:00	1,816,278
12/31/2018 22:00	1,696,735
12/31/2018 23:00	1,661,130

RECEIVED &amp; FILED

JUN 18 2014

EXECUTIVE ORDER  
14-06SECRETARY OF STATE  
COMMISSIONS DIVISION

WHEREAS, clean, reliable, affordable, and abundant energy is critical to the health and welfare of Missouri citizens and to moving Missouri's economy forward; and

WHEREAS, our Strategic Initiative for Economic Growth identified "Energy Solutions" as one of the seven targeted industries with the greatest potential for creating jobs and spurring economic growth in the State of Missouri; and

WHEREAS, establishing policies to encourage the efficient use of energy in all sectors of the economy will allow Missouri citizens to more effectively manage their household budgets and Missouri businesses to run more profitably; and

WHEREAS, in recognition of energy's unique and growing importance to the state's economy, Executive Order 13-03, transferred the Division of Energy, formerly located within the Missouri Department of Natural Resources, to the Missouri Department of Economic Development, the executive agency charged with promoting economic growth and job creation; and

WHEREAS, the transfer of the Division of Energy to the Missouri Department of Economic Development benefits the State of Missouri through a better alignment of goals to promote the development, security and affordability of diverse energy sources essential to the future of Missouri's economy; and

WHEREAS, Missouri will benefit from a cohesive and comprehensive set of policies designed to guide the development of future energy supply and energy use; and

WHEREAS, meeting our need for clean, affordable, and abundant energy in the future will require a diverse energy portfolio and a strategic approach, requiring engagement of all energy stakeholders in a comprehensive planning process; and

WHEREAS, a comprehensive statewide energy plan will foster the efficient allocation of capital among competing energy resources and spur job creation and economic growth; and

WHEREAS, a comprehensive statewide energy plan will provide a framework to ensure stable and predictable electricity prices.

NOW THEREFORE, I, JEREMIAH W. (JAY) NIXON, GOVERNOR OF THE STATE OF MISSOURI, by virtue of the authority vested in me by the Constitution and laws of the State of Missouri, do hereby order that:

The Division of Energy shall lead a statewide initiative to develop a comprehensive State Energy Plan to chart a course toward a sustainable and prosperous energy future that will create jobs and improve Missourians' quality of life.

The State Energy Plan shall include analyses and recommendations to guide the State of Missouri and its stakeholders in reliably meeting future energy needs, while fostering energy-related economic development. The State Energy Plan shall include an inventory and assessment of current and future energy supply and demand, examine existing energy policies, and identify emerging challenges and opportunities.

The Division of Energy shall solicit input from the public and energy stakeholders, including consumers, businesses, utilities, energy companies, academicians, political subdivisions and environmental advocates. The Division of Energy shall conduct public meetings around the state.

The Plan shall identify policies to meet Missouri's short-term and long-term needs for clean, reliable, affordable and abundant energy.



The Plan shall guide the development of Missouri's energy infrastructure to further the State's economic development, while ensuring access to affordable energy resources for all Missouri citizens and businesses.

The Plan shall include, but not be limited to, the following energy-related topics: 1) Electric Generation; 2) Fuels and Resource Extraction; 3) Energy Distribution; 4) Energy Usage; 5) Energy Storage; 6) Energy-related Land Use; 7) Energy/Water Nexus; 8) Energy Pricing and Rate-setting Processes; 9) Energy Security and Assurance; and 10) Energy Resources in Emergencies.

The Plan shall identify any changes to statutes or regulations that are necessary to its implementation.

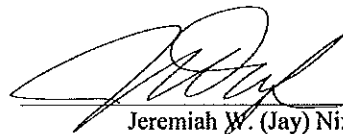
The Plan shall be developed in a manner that will allow the public and representatives of all interested stakeholders to participate.

All executive branch entities, including but not limited to, the Department of Economic Development, the Department of Natural Resources, the Department of Agriculture, the Office of Administration, the Department of Elementary and Secondary Education, the Department of Higher Education, the Department of Transportation, the Public Service Commission, the Office of the Public Counsel, and the State Emergency Management Agency shall provide administrative support and coordination with the Division of Energy in the development of the State Energy Plan.

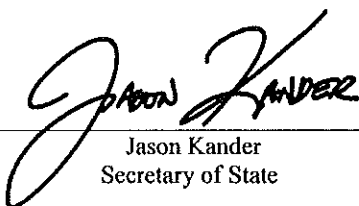
The Division of Energy shall deliver a State Energy Plan to the Governor by May 31, 2015.



IN WITNESS WHEREOF, I have hereunto set my hand and caused to be affixed the Great Seal of the State of Missouri, in the City of Jefferson, on this 18<sup>th</sup> day of June, 2014.

  
Jeremiah W. (Jay) Nixon  
Governor

ATTEST:

  
Jason Kander  
Secretary of State

# Principles of Public Utility Rates

by JAMES C. BONBRIGHT



NEW YORK  
COLUMBIA UNIVERSITY PRESS

of principles, these chapters are mere essays on the nature of the more controversial, largely unresolved, problems rather than attempts at systematic development. All of them have one theme in common: the thesis that the most formidable obstacles to further progress in the theory of public utility rates are those raised by conflicting goals of rate-making policy.

#### CRITERIA OF A DESIRABLE RATE STRUCTURE

Throughout this study we have stressed the point that, while the ultimate purpose of rate theory is that of suggesting feasible *measures* of reasonable rates and rate relationships, an intelligent choice of these measures depends primarily on the accepted *objectives* of rate-making policy and secondarily on the need to minimize undesirable side effects of rates otherwise best designed to attain these objectives. No rational discussion, for example, of the relative merits of "cost of service" and "value of service" as measures of proper rates or rate relationships is possible without reference to the question what desirable results the rate maker hopes to secure, and what undesirable results he hopes to minimize, by a choice between or mixture of the two standards of measurement. Not only this: the very *meaning* to be attached to ambiguous, proposed measures such as those of "cost" or "value"—an ambiguity not completely removed by the addition of familiar adjuncts, such as "out-of-pocket" costs, or "marginal costs," or "average costs"—must be determined in the light of the purposes to be served by the public utility rates as instruments of economic policy. This is a commonplace; but it is a commonplace which, so far from being taken for granted, needs repeated emphasis.

What then, are the good attributes to be sought and the bad attributes to be avoided or minimized in the development of a sound rate structure? Many different answers have been suggested in the technical literature and in the reported opinions by courts and commissions; and a number of writers have summarized their answers in the form of a list of desirable attributes of a rate structure, comparable to the "canons of taxation" found in the treatises on public finance. The list that follows is fairly typical, although I have derived it from a variety of sources instead of relying on any

one presentation. The sequence of the eight items is not meant to suggest any order of relative importance.

1. The related, "practical" attributes of simplicity, understandability, public acceptability, and feasibility of application.
2. Freedom from controversies as to proper interpretation.
3. Effectiveness in yielding total revenue requirements under the fair-return standard.
4. Revenue stability from year to year. ✓
5. Stability of the rates themselves, with a minimum of unexpected changes seriously adverse to existing customers. (Compare "The best tax is an old tax.")
6. Fairness of the specific rates in the apportionment of total costs of service among the different consumers.
7. Avoidance of "undue discrimination" in rate relationships.
8. Efficiency of the rate classes and rate blocks in discouraging wasteful use of service while promoting all justified types and amounts of use:
  - (a) in the control of the total amounts of service supplied by the company;
  - (b) in the control of the relative uses of alternative types of service (on-peak versus off-peak electricity, Pullman travel versus coach travel, single-party telephone service versus service from a multi-party line, etc.).

Lists of this nature are useful in reminding the rate maker of considerations that might otherwise escape his attention, and also useful in suggesting one important reason why problems of practical rate design do not readily yield to "scientific" principles of optimum pricing. But they are unqualified to serve as a base on which to build these principles because of their ambiguities (how, for example, does one define "undue discrimination"?), their overlapping character, and their failure to offer any rules of priority in the event of a conflict. For such a base, we must start with a simpler and more fundamental classification of rate-making objectives.

#### THREE PRIMARY CRITERIA

General principles of public utility rates and rate differentials are necessarily based on simplified assumptions both as to the objectives of rate-making policy and as to the factual circumstances un-

# The National Landscape of Residential TOU Rates

A preliminary summary

**PRESENTED BY**

Ryan Hledik  
Ahmad Faruqui  
Cody Warner

November 2017

THE **Brattle** GROUP

# Introduction and methodology

## Introduction

- The purpose of this presentation is to summarize residential TOU rate offerings in other jurisdictions
- The presentation is organized into two sections
  - Section 1: A survey of current TOU rate offerings
  - Section 2: Emerging trends in TOU rate design

## Methodology

- The survey draws upon data from three sources
  - EIA-861 data (includes data such as # utilities offering TOU, # participants)
  - OpenEI Utility Rates Database (includes TOU price ratio, # pricing periods)
  - Brattle's database of 60+ residential pricing pilots
- We have restricted the survey to US utilities
- The assessment of emerging trends is largely derived from Brattle's experience assisting utilities in ratemaking matters across North America and abroad

# Key findings

## The national survey of residential TOU rates

- 14% of all US utilities offer a residential TOU; roughly half of IOUs offer one
- Where TOU is available, around 3% of customers are enrolled on average
- APS has the highest enrollment, with 51% of its residential customers on a TOU
- 74% of TOU rates have only two pricing periods
- 71% of TOU rates have a price ratio of at least 2-to-1
- Half of TOU rates have a price differential of at least 10 cents/kWh
- Of the utilities offering TOU rates, roughly half offer more than one TOU option

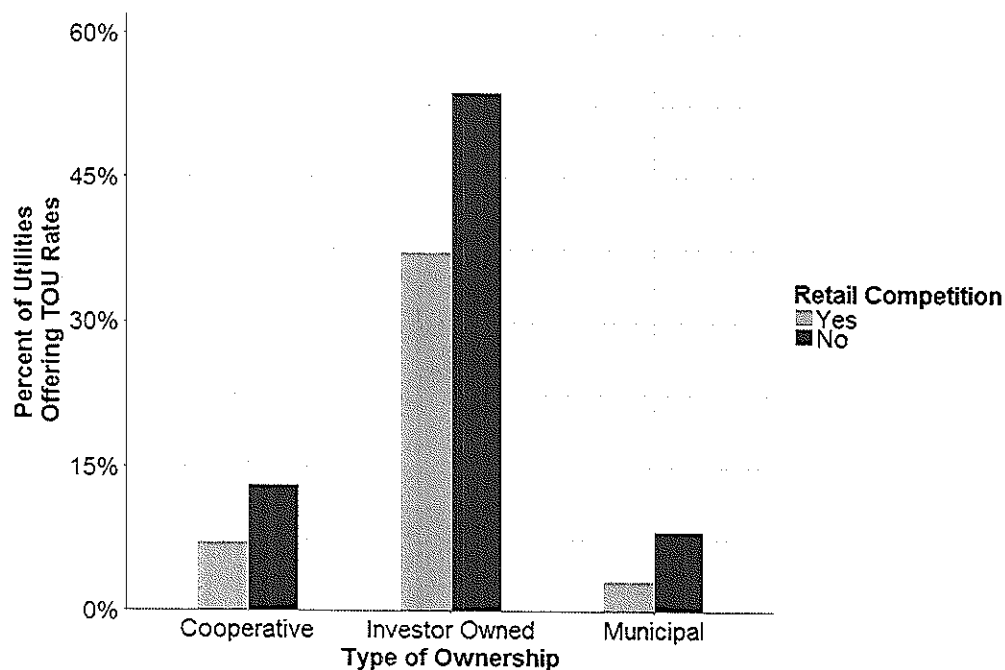
## Emerging trends

- To address solar PV integration challenges, new TOU rates are being introduced with a low mid-day price and a peak period that is delayed until later in the evening
- Several utilities have recently introduced TOU rates on a default (i.e., opt-out) basis for all residential customers
- Volumetric TOU rates are increasingly being proposed by environmental advocates to address grid cost recovery issues associated with rooftop PV adoption (as an alternative to fixed charges or demand charges)
- TOU rates continue to be piloted in North America and internationally; the pilots consistently find that customers shift consumption from peak periods to off-peak periods

# The survey of TOU rates

# Utilities offering TOU rates

## Share of Utilities Offering TOU (by Type of Utility)



Sources and notes: Brattle analysis of 2015 EIA-861 data. Political subdivisions, retail power marketers, and other utilities are excluded in the above chart due to sample sizes less than ten.

## Comments

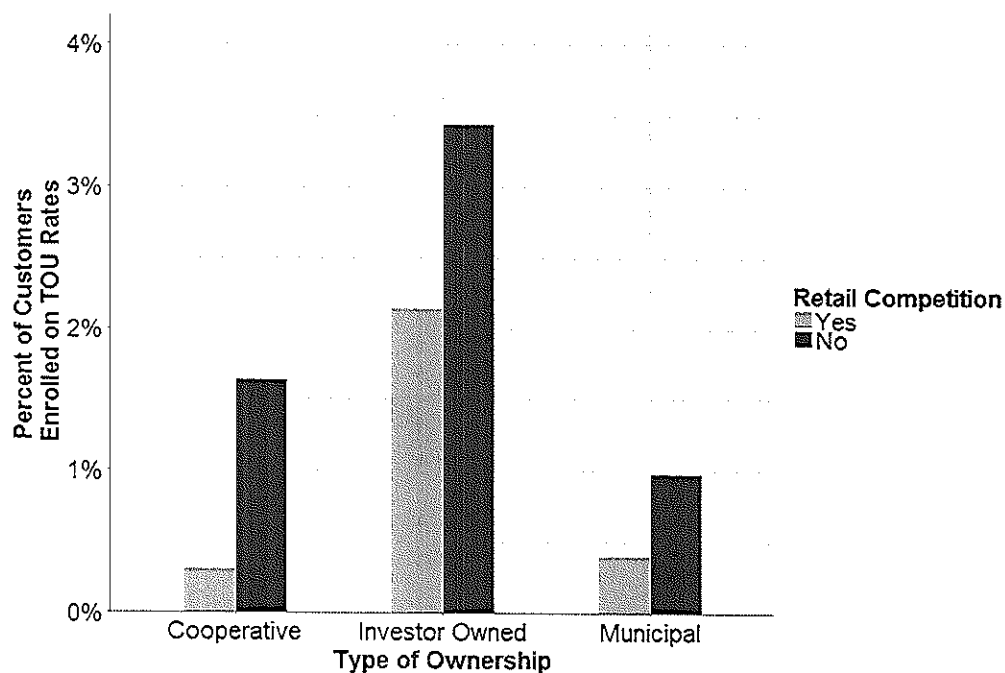
- 14% of all utilities in the EIA-861 database offer residential TOU rates
- TOU rates are most commonly offered by IOUs; 48% of all IOUs offer a TOU rate
- 6% of all TOU rates include a demand charge (in addition to the time-varying volumetric charge)
- Utilities in states with retail competition are less likely to offer TOU rates, though TOU rate offers are still fairly common among those utilities



# Average enrollment

## Share of Customers Enrolled in TOU Where Available

## Comments

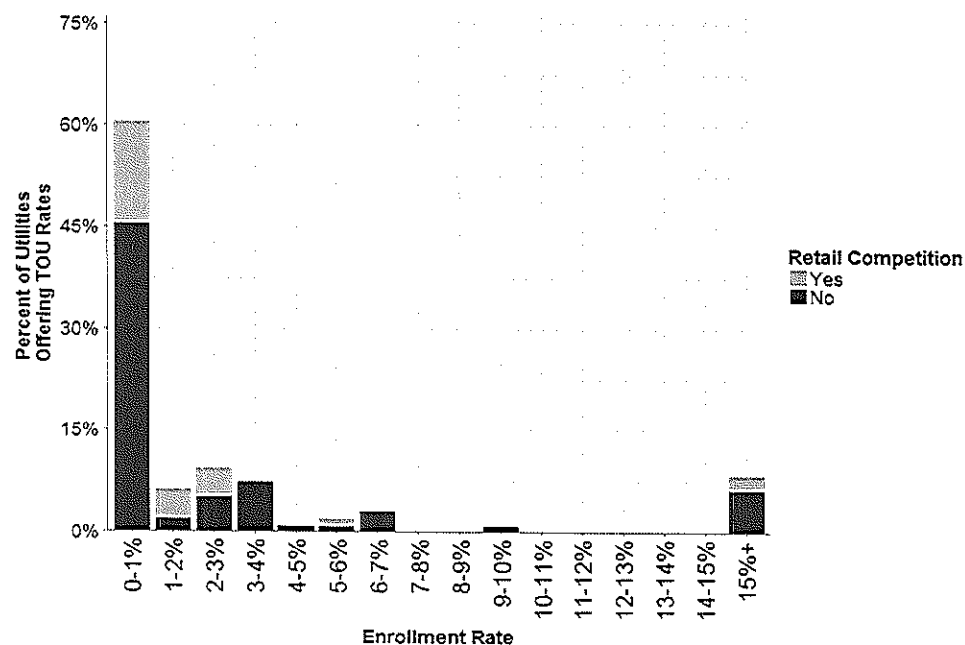


- There are 2.2 million residential customers enrolled in TOU rates in the U.S.
- This amounts to 1.7% of all residential customers, and 3.4% of those customers for which a TOU is available

Sources and notes: Brattle analysis of 2015 EIA-861 data. Political subdivisions, retail power marketers, and other utilities are excluded from the figure. Notably, Salt River Project, a large political subdivision, has more than 30% of its residential customers enrolled in a TOU rate.

# Enrollment distribution across IOUs

## Share of IOU Customers Enrolled in TOU Where Available

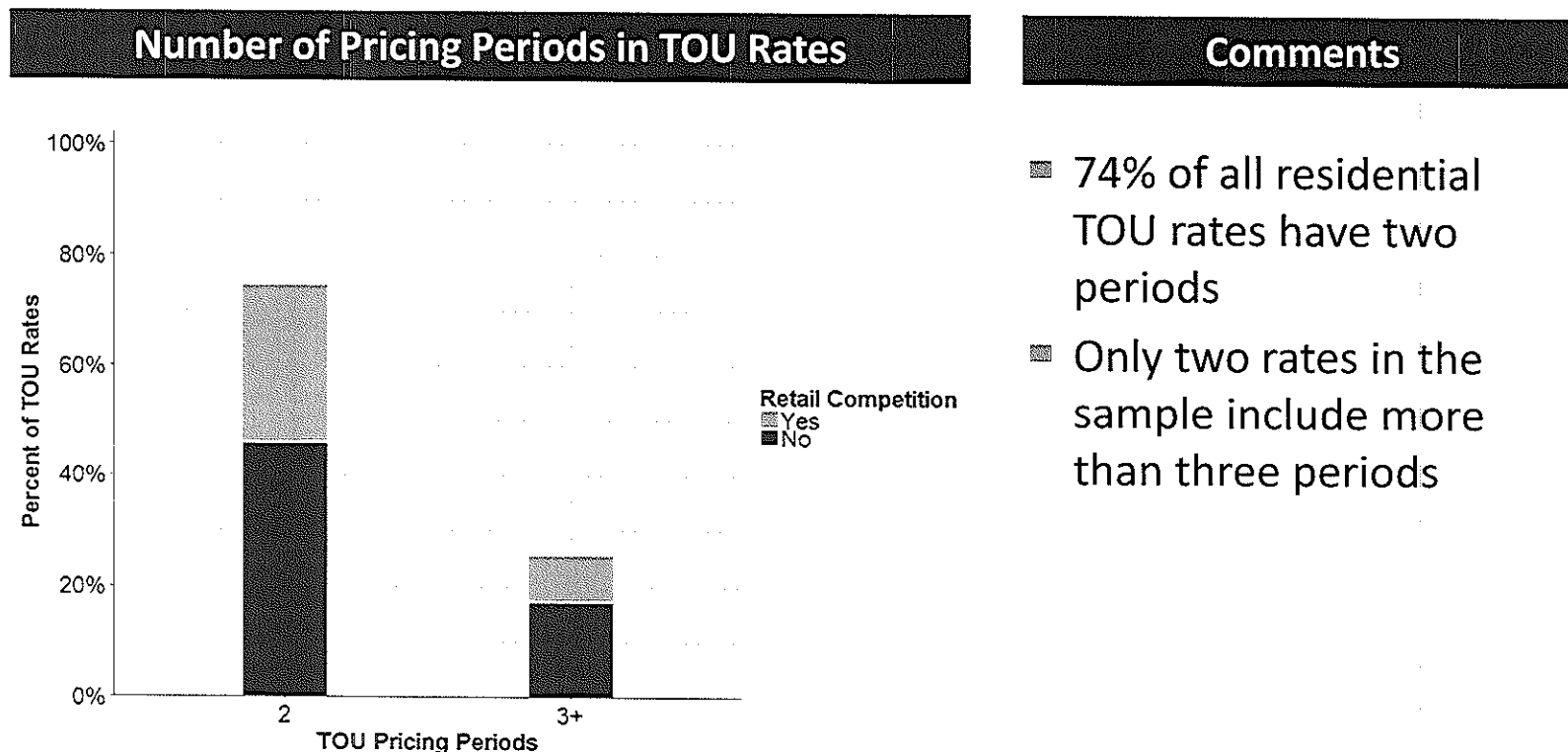


Sources and notes: Brattle analysis of EIA-861 data. Data shown for IOUs only. The EIA data does not distinguish between enrollment in static TOU versus dynamic rates, so in some cases TOU participation may be slightly overstated. We have made adjustments for this where apparent (e.g., high PTR enrollment for BGE and Pepco).

## Comments

- 60% of IOUs offering TOU rates have enrollment rates of less than 1%
- A few utilities with high participation skew the average upward
- Arizona Public Service, for instance, has over half of its residential customers enrolled in TOU rates
- Reasons for low enrollment at other utilities include no marketing of the TOU rate, inconvenient design (i.e., long peak period), and/or additional charges to cover cost of TOU meter (where smart metering has not been deployed)

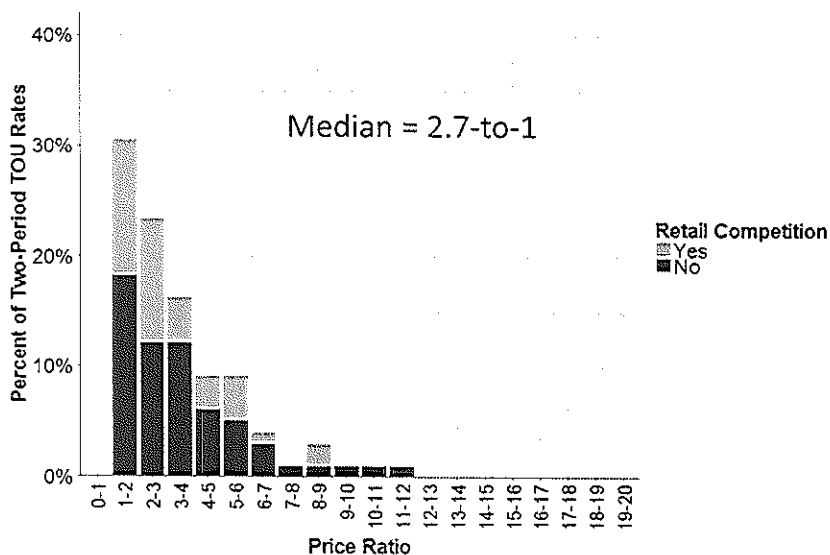
# Number of pricing periods



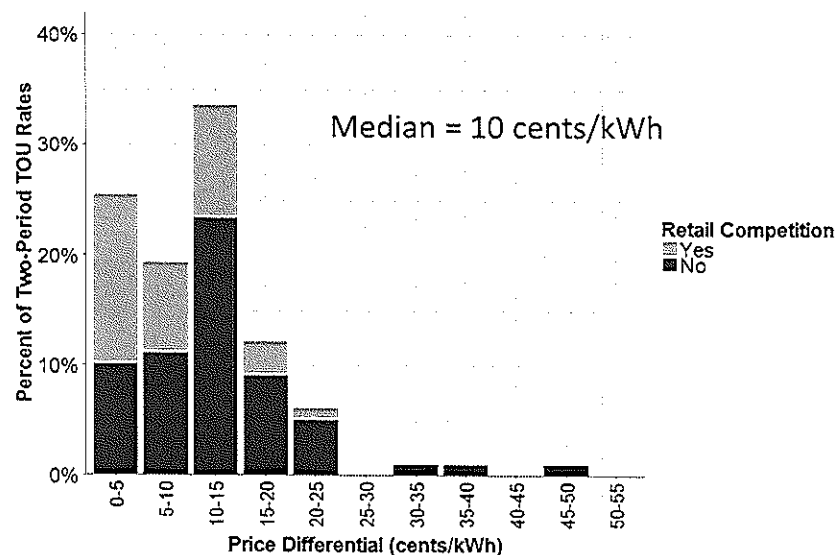
Sources and notes: Brattle analysis of OpenEI Utility Rates Database. Data shown for IOUs only.

# Price ratio (two-period rates)

## Price Ratio in Two-Period Rates



## Price Differential in Two-Period Rates

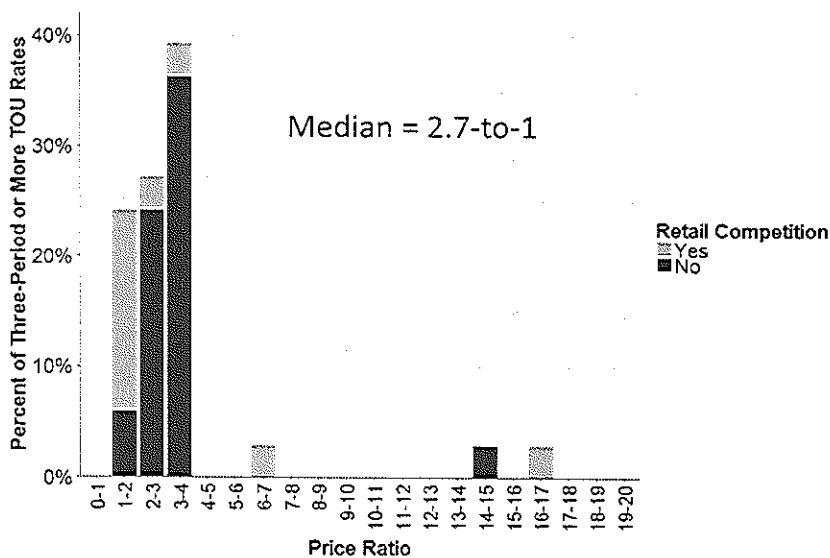


Sources and notes: Brattle analysis of OpenEI Utility Rates Database. Data shown for IOUs only.

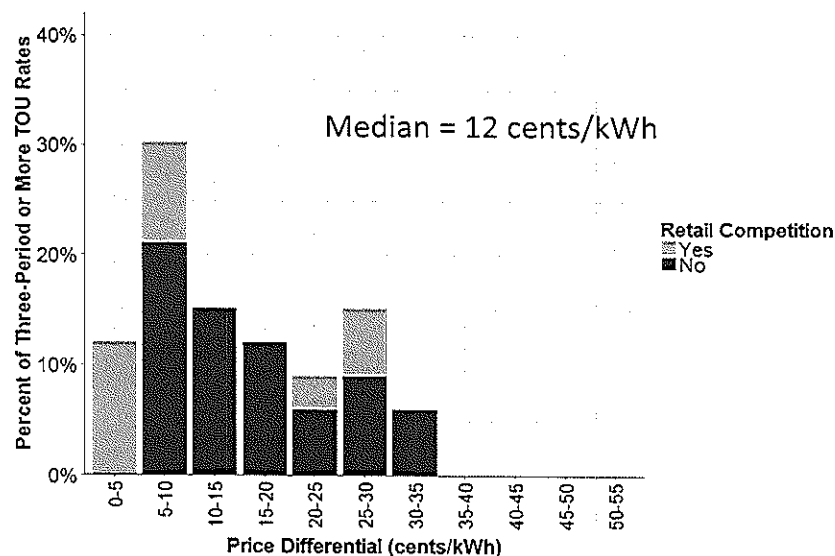
- Among two-period TOU rates, 71% have a price ratio of at least 2-to-1
- Price ratios shown are for the volumetric charge only
- The strength of the price signal will be diluted to some degree by fixed charges and/or additional flat volumetric charges

# Price ratio (3+ period rates)

**Price Ratio in 3+ Period Rates**



**Price Differential in 3+ Period Rates**

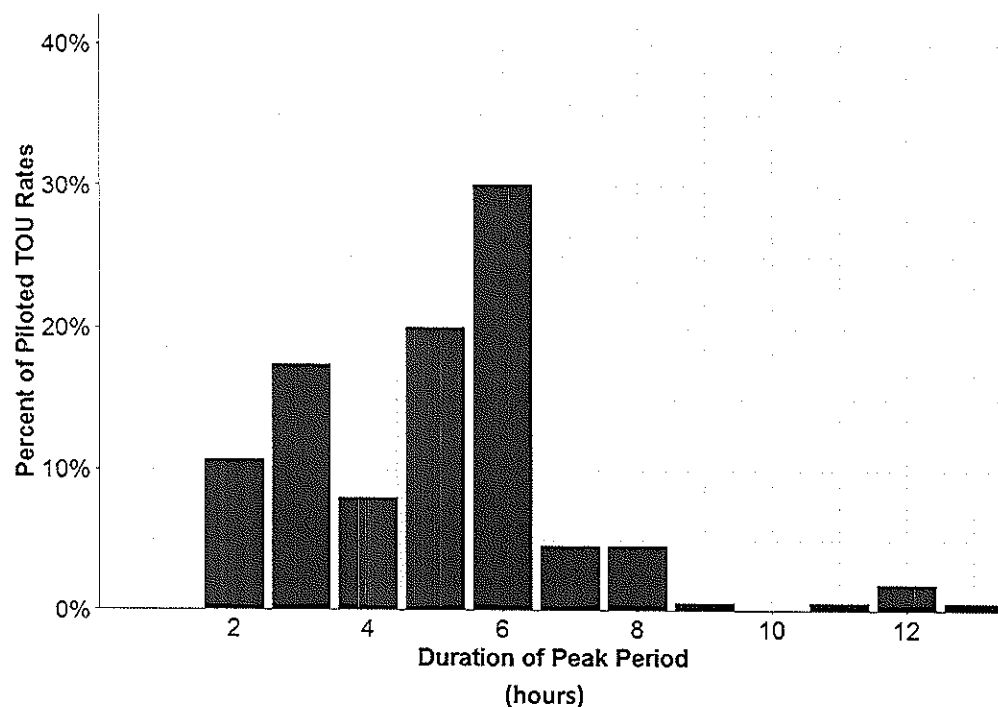


Sources and notes: Brattle analysis of OpenEI Utility Rates Database. Data shown for IOUs only.

- TOU rates with three periods have a similar price ratio as those with two periods
- The figure shows the ratio between the peak price and the super off-peak price

## Duration of peak window

### Peak Period Duration in Recent TOU Pilots

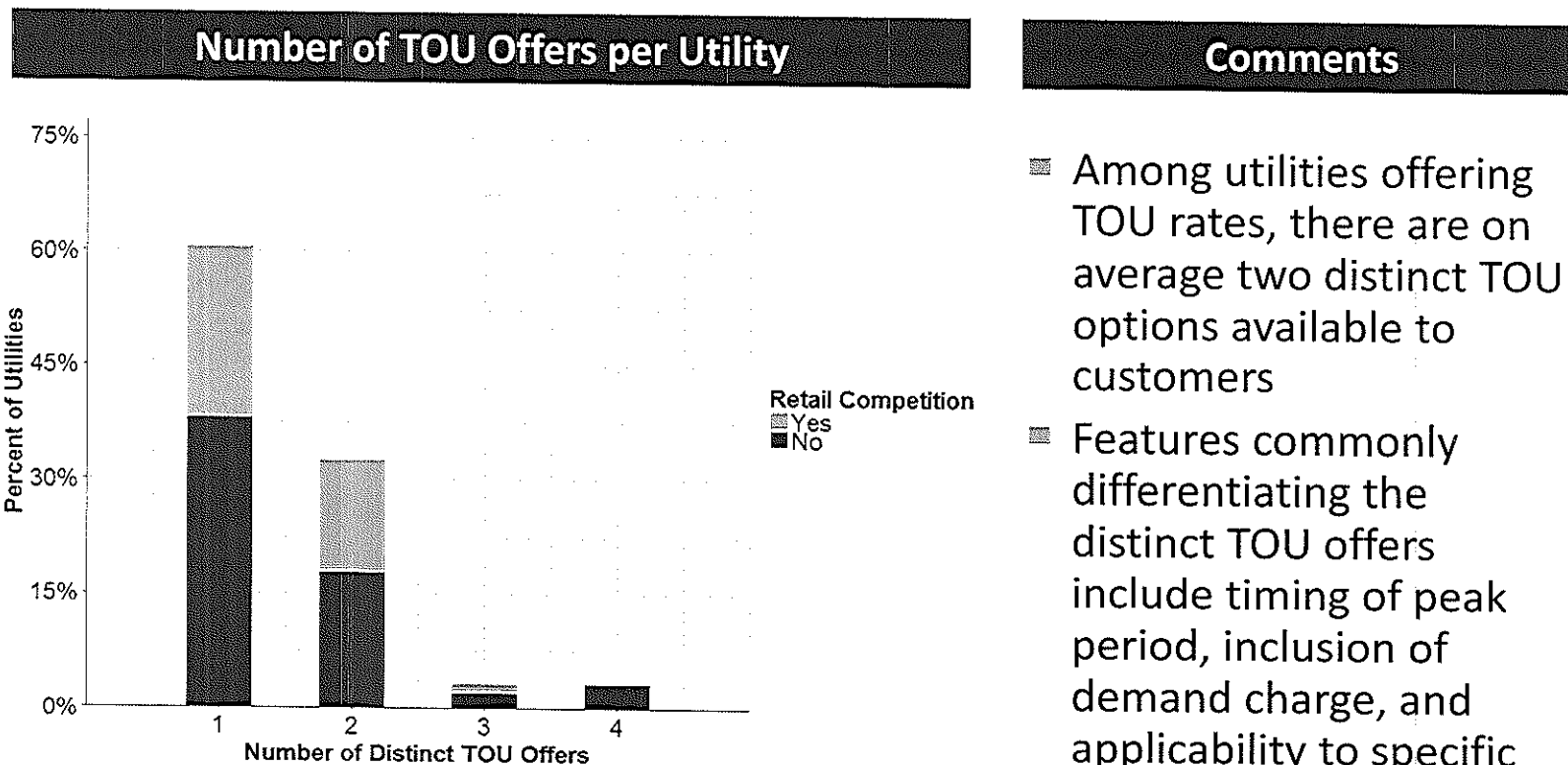


Sources and notes: Chart based Brattle database of TOU rates tested in recent pricing pilots. Includes international TOU pilots (15 of 38 TOU pilots in the database).

### Comments

- TOU rates designed recently (i.e., those developed for pricing pilots in the past decade) typically have a peak period of 6 hours or less – those are the TOU tariffs shown in the figure at left
- Among the broader set of TOU rates being offered on a full-scale basis, it is common for existing TOU rates to have a peak period of 12 hours or more
- Many of those older rates have been offered for many years and have low enrollment

# Distinct TOU offers per utility



Sources and notes: Brattle analysis of OpenEI Utility Rates Database. Data shown for IOUs only.

## Costs recovered through TOU charge

Name of Investor-Owned Utility	State	Residential Customers	Costs Recovered under TOU Rate		
			Generation	Transmission	Distribution
[1] Potomac Electric Power Company	MD	496,347	✓	-	-
[2] Jersey Central Power & Light Company	NJ	977,420	✓	-	✓
[3] Arizona Public Service Company	AZ	1,046,989	✓	-	✓
[4] NSTAR Electric Company	MA	1,063,565	-	✓	✓
[5] Connecticut Light & Power Company	CT	1,117,897	✓	-	-
[6] Baltimore Gas & Electric Company	MD	1,132,934	✓	-	-
[7] San Diego Gas & Electric Company	CA	1,266,249	✓	-	-
[8] Ohio Power Company	OH	1,276,363	✓	-	✓
[9] Consumers Energy Co	MI	1,577,087	✓	-	-
[10] Virginia Electric & Power Company	VA	2,150,818	✓	-	✓
[11] Southern California Edison Company	CA	4,381,511	✓	-	✓
[12] Pacific Gas & Electric Company	CA	4,749,486	✓	-	✓
<b>Average</b>		<b>1,769,722</b>	<b>92%</b>	<b>8%</b>	<b>58%</b>

- We reviewed the tariffs of large utilities that offer a TOU
- Generation costs are almost always recovered on a time-differentiated basis
- Distribution costs are recovered through a time-varying charge in roughly half of the cases
- Transmission costs are recovered through a time-varying charge in only one case
- Ten other TOU rates offered by large IOUs were researched, though information on the unbundled costs was not available



# Emerging trends

## Design

### **Solar PV adoption is causing some utilities to rethink the design of residential TOU rates**

#### **The “duck curve” introduces a need for:**

- Increased load during mid-day hours when there is excess solar PV output; and
- Reduced load during late evening hours when PV output drops and generation must otherwise ramp up quickly to balance the system

#### **As a result, the TOU peak period price is being shifted later in the evening and/or the price is being reduced during the middle of the day**

- APS: Revised TOU design to include a super-off-peak winter price between 10 am and 3 pm, and shifted the peak period from noon-7 pm to 3-8 pm
- Hawaii: Piloting a TOU rate with discounted mid-day price (9 am to 5 pm) and delayed peak period (5 pm to 10 pm)
- California: Delaying start of peak period by five hours (new peak period definition will be 4-9 pm in San Diego, previously started at 11 am)
- SW England: Distribution utility piloted TOU rates with low mid-day price to relieve distribution system constraints caused by high PV output

## Deployment

**Historically, TOU rates have been offered to residential customers on an opt-in basis**

**However, with the deployment of smart metering, there has been a gradual shift toward default or mandatory TOU offerings**

- SMUD: Transition to be complete by end of 2019
- California IOUs: Transition to begin in 2019 (SCE proposed expedited rollout)
- Ontario, Canada: Province-wide rollout of default TOU was initiated for all utilities in 2012
- Ireland: TOU variable charges will be a required feature of competitive retail suppliers following the deployment of smart metering (by 2020)
- Italy: Default TOU with modest price differential has been in place for many years
- Other: Spain and Maryland, USA offer default time-varying rate structures that are dynamic in nature rather than static TOU rates

## Motivation

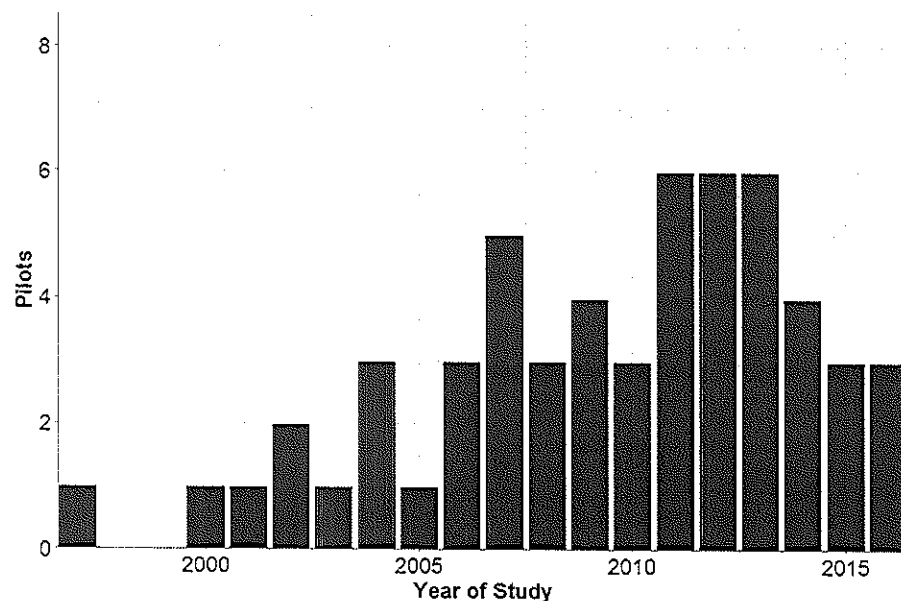
**Historically, the primary motivation for offering TOU rates has been to introduce a more cost-reflective rate that provides customers with an incentive to reduce consumption during higher-cost times of day**

**Recently, intervenors in DG rates proceedings have proposed TOU rates as a solution to the challenge of recovering grid costs from customers with rooftop solar**

- Volumetric TOU rates are commonly proposed by solar advocacy organizations as an alternative to higher fixed charges or the introduction of a demand charge
- Sometimes the rate proposals include a dynamic price signal which is combined with the static TOU price signal (i.e., CPP/TOU combo)
- Arizona, Nevada, Kansas, and Colorado are just a few examples of states where TOU rates have been proposed by intervenors for this reason:

# TOU pilots

## Number of Residential TOU Pilots Initiated, by Year



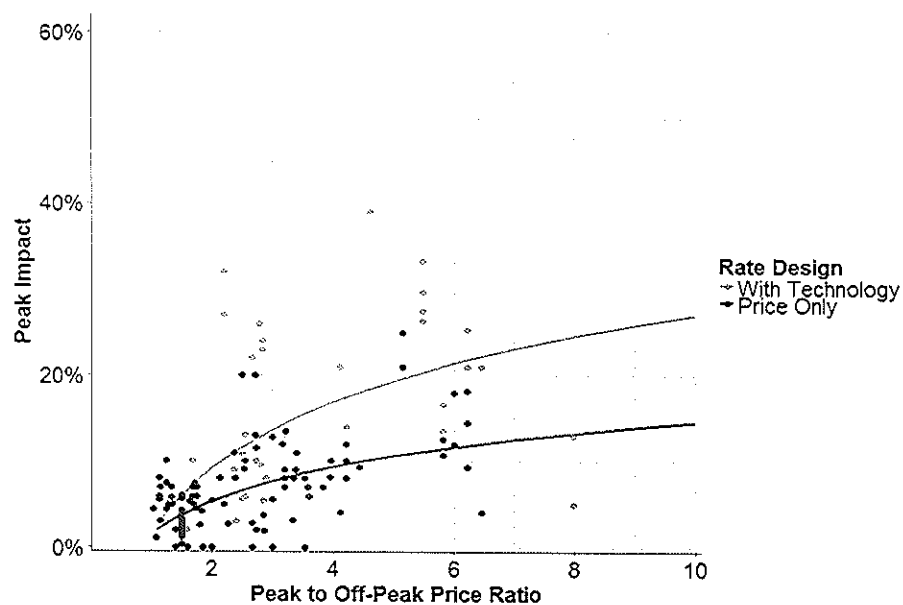
Sources and notes: Chart based Brattle database of TOU rates tested in recent pricing pilots. Includes international TOU pilots (15 of 38 TOU pilots in the database).

## Comments

- 38 TOU pilots have been conducted over the past two decades
- The pilots have tested 153 different TOU rates
- There was a surge in pilot studies in the 2011-2013 timeframe driven by US DOE stimulus funding, but TOU rates have continued to be piloted since

# Price response

## Relationship Between Price Response and Price Ratio



Sources and notes: Chart based Brattle database of TOU rates tested in recent pricing pilots. Includes international TOU pilots (15 of 38 TOU pilots in the database).

## Comments

- Results of the recent TOU pilots demonstrate that customers respond to time-varying rates by shifting their on-peak usage to off-peak hours
- As the price ratio increases, customers shift usage in greater amounts, but at a declining rate
- When offered with enabling technology, the effect is stronger

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