

**Exh. JLB-26
Dockets UE-190529/UG-190530 and
UE-190274/UG-190275 (*consolidated*)
Witness: Jason L. Ball**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

**DOCKETS UE-190529
and UG-190530 (*consolidated*)**

In the Matter of the Petition of

PUGET SOUND ENERGY

**For an Order Authorizing Deferral
Accounting and Ratemaking Treatment
for Short-life UT/Technology Investment**

**DOCKETS UE-190274 and
UG-190275 (*consolidated*)**

EXHIBIT TO TESTIMONY OF

Jason L. Ball

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

Advancing the Practice of Rate Design

November 22, 2019

Advancing the Practice of Rate Design

Presented By
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Principal

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St. Petersburg, Florida
November 6, 2019

FAQ 1. What are the main features of advanced rate designs?

- They reflect the cost structure of electricity
- They allow customers to manage their electricity bills
- They incentivize distributed energy resources
- They provide choices to customers



FAQ 2. What are the trade-offs in rate design?

The well-known Bonbright Principles are predicated on **cost-causation**

Customer considerations will require that strictly cost-reflective tariff designs be modified to enhance customer understanding and minimize rate shock

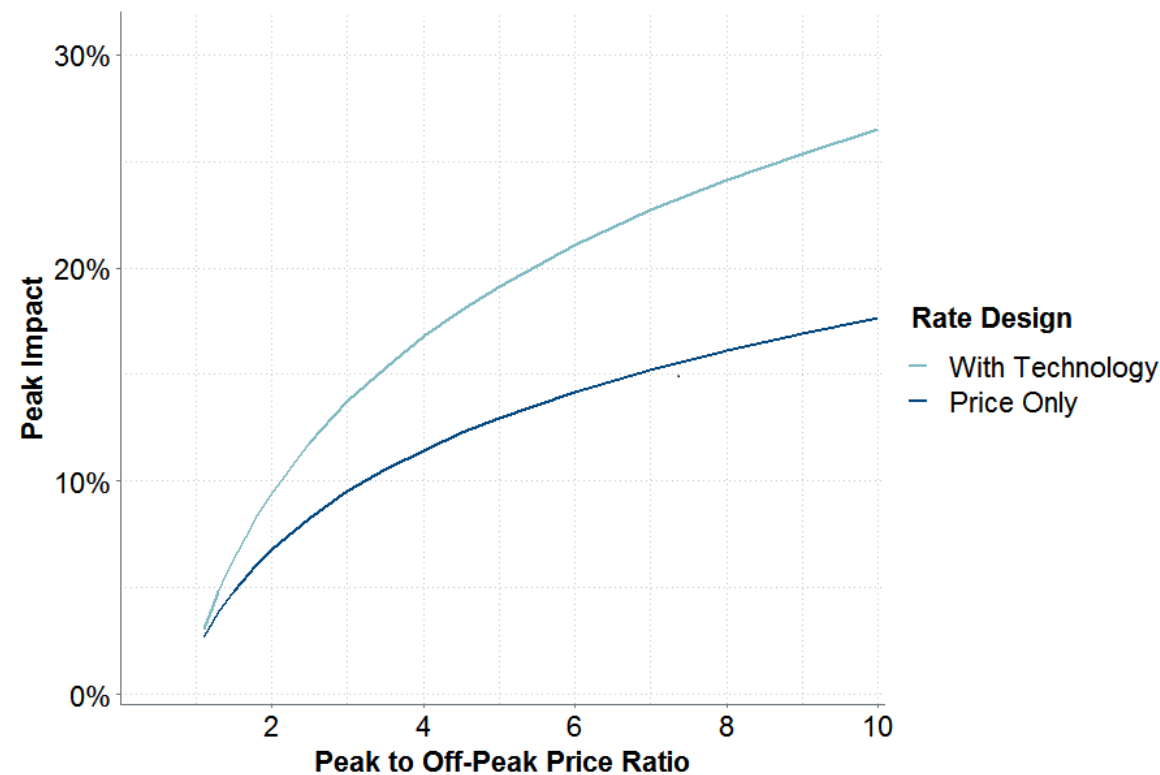
FAQ 3. What are some examples of advanced rate design?

Rate Design	Definition
Fixed bill	Customers pay a fixed monthly bill accompanied with tools for lowering the bill (such as incentives for lowering peak usage)
Seasonal Rates	The year is divided into different seasons, commonly winter and summer, each of which have distinct rates. Prices are higher in peak seasons to reflect seasonal variation in the cost of supplying energy.
Demand Charges	Customers are charged based on peak electricity consumption, typically over a span of 15, 30, or 60 minutes.
Time-of-Use (TOU)	The day is divided into peak and off-peak time periods. Prices are higher during the peak period hours to reflect the higher cost of supplying energy during that period.
Critical Peak Pricing (CPP)	Customers pay higher prices during critical events when system costs are highest or when the power grid is severely stressed.
Peak Time Rebates (PTR)	Customers are paid for load reductions on critical days, estimated relative to a forecast of what the customer would have otherwise consumed (their “baseline”)
Variable Peak Pricing (VPP)	During alternative peak days, customers pay a rate that varies by day to reflect dynamic variations in the cost of electricity.
Demand Subscription Service (DSS)	Customers subscribe to a kW demand level based on the size of their connected load. If they exceed their subscribed level, they must reduce their demand to restore electrical service.
Transactive Energy (TE)	Customers subscribe to a “baseline” load shape based on their typical usage patterns, and then buy or sell deviations from their baseline.
Real-Time Pricing (RTP)	Customers pay prices that vary by the hour to reflect the actual cost of electricity



FAQ 4. Do time-varying rate designs significantly change customer load shapes?

- A meta-analysis of 349 deployments worldwide shows that when customers face a strong price signal (a higher on-peak price), they reduce peak electricity usage. And if the price signal is accompanied by enabling technology, they reduce their peak electricity usage even more.



Source: Arcturus Data Base, The Brattle Group.

FAQ 5. Is anyone offering modern rate designs?

	Mandatory	Opt-in	Opt-out
Flat bill		Georgia Power, Oklahoma Gas & Electric	
Peak-time rebates			Maryland, California, Illinois
Demand charges		Arizona Public Service, Black Hills, Salt River Project,	
Time-of-use (TOU) volumetric rates	Fort Collins (Colorado)	Texas	SMUD (California)
Dynamic volumetric rates (CPP, PTR, and RTP)		Oklahoma, Illinois	California



FAQ 6. Have customers accepted advanced rate designs?

Utility or Location	Type of Rate	Applicability	Participating Customers
Oklahoma Gas & Electric	Variable Peak Pricing (VPP)	Opt-in	20% (130,000)
Maryland (BGE, Pepco, Delmarva)	Dynamic Peak Time Rebate (PTR)	Default	80%
Ontario, Canada	Time-of-Use (TOU)	Default	90% (3.6 million)
Great Britain	Time-of-Use (TOU)	Opt-in	13% (3.5 million)
Hong Kong (CLP Power Limited)	Dynamic Peak Time Rebate (PTR)	Opt-in	27,000
Arizona (APS, SRP)	Time-of-Use (TOU)	Opt-in	57% of APS' residential customers (20% of which are also on a demand charge), 36% of SRP's
California (PG&E, SCE, SDG&E)	Time-of-Use (TOU)	Default (2019)	TBD – 75-90%*
California (SMUD)	Time-of-Use (TOU)	Default	75-90%*
Colorado (Fort Collins)	Time-of-Use (TOU)	Mandatory (for residential)	100%
Illinois (ComEd, Ameren Illinois)	Real Time Pricing (RTP)	Opt-in	50,000
France	Time-of-Use (TOU)	Opt-in	50%
Spain	Real Time Pricing (RTP)	Default	50%
Italy	Time-of-Use (TOU)	Default	75-90%*

*Estimated participation based on historical trends



FAQ 7. What are the different ways for transitioning to advanced rate designs?

Educate and inform customers about the need to modify rate designs

Pilot and field-test the new rate designs

Offer the advanced rate designs on an opt-in basis

Make one of them the default rate design with bill protection that's gradually phased out

Supplement the rate designs with enabling technologies



References

“2040: A Pricing Odyssey,” *Public Utilities Fortnightly*, June 1, 2019.

“Status of Residential Time-of-Use Rates in the U.S.,” with Ryan Hledik and Cody Warner, *Public Utilities Fortnightly*, November 1, 2018.

“Rate Design 3.0 – Future of Rate Design,” *Public Utilities Fortnightly*, May 2018.

“Arcturus 2.0: A meta-analysis of time-varying rates for electricity,” with Sanem Sergici and Cody Warner, *The Electricity Journal*, 30:10, December 2017, pp. 64-72.

“Moving Forward with Tariff Reform,” with Mariko Geronimo Aydin, *Energy Regulation Quarterly*, Volume 5, Issue 4, December 2017.

“Innovations in Pricing: Giving Customers What They Want,” *Electric Perspectives*, September/October 2017.



Appendix A

A Pocket History of Rate Design



A pocket history of rate design

Year	Author	Contribution
1882	Thomas Edison	<ul style="list-style-type: none"> Electric light was priced to match the competitive price from gas light and not based on the cost of generating electricity
1892	John Hopkinson	<ul style="list-style-type: none"> Suggested a two-part tariff with the first part based on usage and the second part based on connected kW demand
1894	Arthur Wright	<ul style="list-style-type: none"> Modified Hopkinson's proposal so that the second part would be based on actual maximum demand
1897	Williams S. Barstow	<ul style="list-style-type: none"> Proposed time-of-day pricing at the 1898 meeting of the AEIC, where his ideas were rejected in favor of the Wright system
1946	Ronald Coase	<ul style="list-style-type: none"> Proposed a two-part tariff, where the first part was designed to recover fixed costs and the second part was designed to recover fuel and other costs that vary with the amount of kWh sold
1951	Hendrik S. Houthakker	<ul style="list-style-type: none"> Argued that implementing a two-period TOU rate is better than a maximum demand tariff because the latter ignores the demand that is coincident with system peak
1961	James C. Bonbright	<ul style="list-style-type: none"> Published "Principles of Public Utility Rates" which would become a canon in the decades to come



A pocket history of rate design (concluded)

Year	Author	Contribution
1971	William Vickrey	<ul style="list-style-type: none"> Proffered the concept of real-time-pricing (RTP) in <i>Responsive Pricing of Public Utility Services</i>
1976	California Legislature	<ul style="list-style-type: none"> Added a baseline law to the Public Utilities Code in the <i>Warren-Miller Energy Lifeline Act</i>, creating a two-tiered inclining rate
1978	U.S. Congress	<ul style="list-style-type: none"> Passed the <i>Public Utility Regulatory Act (PURPA)</i>, which called on all states to assess the cost-effectiveness of TOU rates
1981	Fred Schweppe	<ul style="list-style-type: none"> Described a technology-enabled RTP future in <i>Homeostatic Control</i>
2001	California Legislature	<ul style="list-style-type: none"> Introduced <i>AB 1X</i>, which created the five-tier inclining block rate where the heights of the tiers bore no relationship to costs. By freezing the first two tiers, it ensured that the upper tiers would spiral out of control
2001	California PUC	<ul style="list-style-type: none"> Began rapid deployment of California Alternative Rates for Energy (CARE) to assist low-income customers during the energy crisis
2005	U.S. Congress	<ul style="list-style-type: none"> Passed the <i>Energy Policy Act of 2005</i>, which requires all electric utilities to offer net metering upon request



Presenter Information



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Ahmad Faruqui is an internationally recognized authority on the design, evaluation and benchmarking of tariffs. He has analyzed the efficacy of tariffs featuring fixed charges, demand charges, time-varying rates, inclining block structures, and guaranteed bills. He has also designed experiments to model the impact of these tariffs and organized focus groups to study customer acceptance. Besides tariffs, his areas of expertise include demand response, energy efficiency, distributed energy resources, advanced metering infrastructure, plug-in electric vehicles, energy storage, inter-fuel substitution, combined heat and power, microgrids, and demand forecasting. He has worked for nearly 150 clients on 5 continents, including electric and gas utilities, state and federal commissions, governments, independent system operators, trade associations, research institutes, and manufacturers.

Ahmad has testified or appeared before commissions in Alberta (Canada), Arizona, Arkansas, California, Colorado, Connecticut, Delaware, the District of Columbia, FERC, Illinois, Indiana, Kansas, Maryland, Minnesota, Nevada, Ohio, Oklahoma, Ontario (Canada), Pennsylvania, Saudi Arabia, and Texas. He has presented to governments in Australia, Egypt, Ireland, the Philippines, Thailand, New Zealand and the United Kingdom and given seminars on all 6 continents. He has also given lectures at Carnegie Mellon University, Harvard, Northwestern, Stanford, University of California at Berkeley, and University of California at Davis and taught economics at San Jose State, the University of California at Davis, and the University of Karachi.

His research been cited in Business Week, The Economist, Forbes, National Geographic, The New York Times, San Francisco Chronicle, San Jose Mercury News, Wall Street Journal and USA Today. He has appeared on Fox Business News, National Public Radio and Voice of America. He is the author, co-author or editor of 4 books and more than 150 articles, papers and reports on energy matters. He has published in peer-reviewed journals such as Energy Economics, Energy Journal, Energy Efficiency, Energy Policy, Journal of Regulatory Economics and Utilities Policy and trade journals such as The Electricity Journal and the Public Utilities Fortnightly. He is a member of the editorial board of The Electricity Journal. He holds BA and MA degrees from the University of Karachi, both with the highest honors, and an MA in agricultural economics and a PhD in economics from The University of California at Davis, where he was a research fellow.

