

Comments by James Adcock on Integrated Resource Planning rulemaking UE-191023

Docket number of this proceeding: UE-191023

Commenting party's name: James Adcock, Electrical Engineer

The title and date of the comment or comments:

Comments by James Adcock on Incremental Cost Provision: UE-191023

2/17/2020

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As a quick suggestion, I would ask that you consider substituting the following formula:

$$[ICC_1 + ICC_2 + ICC_3 + ICC_4] / [WASR_0 + WASR_1 + WASR_2 + WASR_3]$$

Which should provide similar results to what you previously proposed, but which should be less susceptible to anomalous results due to anomalous situations, such as an anomalous very low sales year – because everyone was simply hunkered down in place due to COVID-19, for example. “Statistically speaking” taking the simple average of a sequence of fractions, as you originally suggested, would be unusual.

Thank you for your consideration,

James Adcock