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PUBLIC SERVICE COMMISSION
District of Columbia
Your Energy. Your Voice.

FORMAL CASE NO. 1130, IN THE MATTER OF THE INVESTIGATION INTO MODERNIZING THE ENERGY DELIVERY SYSTEM FOR INCREASED SUSTAINABILITY

FIFTH RATE DESIGN WORKING GROUP
MEETING MINUTES (AMENDED)

Meeting Commencement

By Order No. 20286,[1] the Commission directed the Rate Design Working Group ("RDWG") to reconvene to review a holistic evaluation and assessment of current rate designs in the District of Columbia and other jurisdictions in order to propose best practice rate design solutions including a new residential Dynamic Pricing program. By Order No. 20609 in *Formal Case No. 1155*, the Commission also assigned the RDWG to review implementation of Pepco's Residential Whole-House EV Time-of-Use Rate (Schedule "R-PIV"), explore improvements to Pepco's TOU tariff methodology, and directed Pepco to file a progress report on behalf of the RDWG within six (6) months of the date of Order No. 20609. The Order also directed the RDWG to investigate the impacts of implementing higher on- and off-peak ratios based on DC-specific data and explore input/data issues raised by DOEE in its comments regarding Schedule "R-PIV".[2] The RDWG commenced its fifth working group meeting via conference call, on March 4th, 2021, from 10am to 12:30pm to discuss the Commission's directives.

Attendees

Sign-in Sheet (see Attachment No. 1)

Issues Discussed

Agenda (see Attachment No. 2)

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[1] *Formal Case No. 1130, In the Matter of the Investigation into Modernizing the Energy Delivery System for Increased Sustainability*, Order No. 20286, ¶ 54, rel. January 24, 2020.

[2] *Formal Case No. 1155, In the Matter of the Application of the Potomac Electric Power Company for Approval of its Transportation Electrification Program*, Order No. 20609, ¶ 16, rel. August 14, 2020.

Synopsis of Issues Discussed

- **Oracle Presentation on Time Varying Rates and Behaviors (Attachment No. 3)** Oracle presented on variable rates, including perception, rate literacy, and behavioral load shaping ("BLS"). Staff asked which Mid-Atlantic States have home energy reports ("HER") generated by Oracle. Oracle responded DE, MD, NJ, PA, VA, and overall in at least 36 states. Staff asked about MD approving BLS, and whether that is a part of the HER? Oracle stated that it is a separate tool, and if both are operating in a jurisdiction, they are produced to not overlap. It is used for any new rate structure that differs from standard rates, including TOU or dynamic pricing. Staff asked about the cost and whether BLS replaces parallel billing? Oracle responded that their program shows a weekly trend of what the bill is on track to cost.
- DCCA noted that their position is to have TOU as a default, opt-out program, and the coaching would be imperative. DCCA asked if Oracle worked with any jurisdiction that has default TOU. Oracle stated that Arizona Public Service uses default TOU rates and regardless whether TOU is default or optional, coaching and education is key to rollout. DCCA asked if an OPower product is typically bought by the utility and included in base rates? Oracle confirmed that is standard, and the utility seeks approval in rate case proceedings. Oracle has several long-running programs in CA as well and is piloting BLS this summer at one utility in CA. DCCA asked about real time pricing in IL. Oracle replied that it is not sure to what extent they are involved with ComEd, and later clarified that they helped ComEd with real time and hourly pricing in 2020 but ComEd is not currently using BLS.
- DOEE asked if Oracle has been able to isolate any incremental impact of BLS on customer load reduction? Oracle stated that it will relay specific information to the group but results are seen with a TOU rate and BLS paired together. Oracle noted that it is running a test in MD on an old TOU rate to analyze this specific impact. Brattle was hired to oversee MD Grid Modernization TOU pilot, where they are seeing conservation of energy usage due to TOU rates. DOEE asked about cost causation and demand-side management (DSM). Does Oracle see TOU rates being used by utilities more for cost causation or for demand-side management? Oracle replied that it is mostly outside of DSM efforts from their experience. Brattle followed-up that it is not uniform, but most starting points are for cost-reflective rates. In some jurisdictions, the peak to off-peak prices aren't very different, and a TOU rate based on cost causation does not incent customers to shift load. In those cases, the price signals can be strengthened beyond what cost causation analysis would result in. A main goal is to manage the risk to the customer when being put on a new rate. DOEE asked about utilities that do tweak rate design to increase the price signal, and whether those utilities are able to set targets for load reduction, then meet those targets by adjusting the time periods or the ratios? Are TOU rates being used for planning purposes? Brattle responded that there are some utilities that do, especially ones who have Integrated Resource Planning processes. They use the pricing to reach MW reduction targets. It is a

balance between cost causation and demand response. Rates are still a means to collect revenue to cover costs. In a pilot setting, there's pros to deviating from cost causation.

- DCCA noted that DOEE addressed rate setting from the utility perspective and equitable load shaping. DCCA pointed out that there is an added dimension of climate change to consider. It asked whether in Brattle's experience, did TOU, when properly designed, have an impact on peak load? Brattle stated that when price signals are reasonable, there are clear peak reductions related to TOU rates. Not only are there peak savings, there is also conservation for some customers. Additional benefit of good price signals is to encourage customers to invest in efficient and load-shifting technologies such as storage and PV. DOEE stated their position is that TOU rates should be considered as a quasi-DER or demand-side resource. TOU should not be solely looked at in terms of cost causation.
- **Pepco's R-PIV Update (Attachment No. 4):** Pepco presented its modified R-TOU-P rate design methodology. The modified on peak ratio is now 3.68 for summer (June-October) and 3.47 for winter (November-May). Staff asked, how many customers are enrolled in R-PIV? Pepco believed it is 11 or 12, from the last update. Staff asked about R-PIV-Green tariff. This is a green rider, optional for customers enrolled in R-PIV to receive 100% renewable energy. The cost is the incremental RECs needed to be purchased and retired to serve 100% clean energy to that customer, based on most updated REC prices. DCCA noted that the peak/off-peak ratio should be higher than cost causation, as done in MD. The same TOU ratios should be used for EVs as residents. Pepco responded noting that a R-PIV is a whole-house rate available to EV owners. The Residential TOU pilot in MD is generation, transmission, and distribution TOU. The peak/off-peak ratio for the proposed DC R-PIV rate is generation-only and is consistent with the peak/off-peak ratio of the generation component of the MD pilot rate. DCCA asked about the differences between the two rates from a customer view. Pepco noted that it will provide a comparison prior to the next RDWG meeting. GRID2.0 noted that there is some confusion, but as there aren't many EV owners yet, that group can be used to test the rates and ratios.
- DOEE noted that it is supportive of Pepco's revisions, and points that baseline R-PIV using DC Schedule "R" data instead of MD Schedule "R-PIV" data is important because it creates a rate that is revenue neutral (bill neutral) in the absence of load shift, and allows R-PIV customers to reduce bills when they shift load (relative to Schedule "R"). The R-PIV rate model establishes an important model for any other proposed TOU rates, including the residential TOU pilot. DOEE believes that it is important that the customers have an opportunity to attain some of the benefits the grid will receive from load shifting. It would reward load shifting. Selecting new on-peak hours based on actual peak periods is important, especially for winter where there is a morning peak. If these proposed modifications are implemented, the R-PIV rate will be a two-tier, generation-only, TOU rates that is appropriate for EV owners and residential customers at large. DOEE asked why the R-PIV rate with the proposed revisions should not be made available to all residential customers regardless of EV ownership, since its design is effectively identical

to Pepco's original proposal for R-TOU-P. Staff stated that R-PIV is for EV owners under SOS; it is not the same as TOU pilot. The ratio should be further discussed for a pilot TOU rate. DCCA asked if there are times of day where peaks are different between cost and load peaks. Pepco stated it was asked in Staff's survey matrix, but that both peaks generally align.

- DOEE asked whether the WG had reached consensus for R-PIV. Staff asked, will DOEE perform a survey on the rate? After the meeting, DOEE did advise staff about their recommended survey questions. DCCA suggested that Staff circulate a template with headings and have stakeholders fill out survey questions. Pepco noted that the survey should focus on the R-PIV proposal currently before the RDWG separate from broader questions of expanding TOU rates to all residential customers.
- **Staff's Survey Matrix**: Staff shared a survey matrix, looking for clarification and answers to remaining questions. Pepco believes that the amount of treatment groups should be limited to two. Staff asked about a low income and a senior citizen group; would that group be combined? Pepco stated that there would be a standard treatment group of 835 customers, and low-income customers and senior/disabled together could be an additional treatment group. Recruiting may be difficult to meet statistical significance, particularly if these "standard" and "at-risk" groups are further subdivided. In MD, NEM had an enrollment cap but not an enrollment target. The two treatment groups in MD are standard customers and low-income customers. There was still some analysis done after the fact for NEM, larger usage customers etc., but there was no guaranteed statistically significant analysis. Staff asked about initial survey questions given to program participants; was it comprehensive? Brattle indicated that there were questions to discover customer characteristics but had to strike a balance between information asked and the length of the survey. The utility could tell some data about the customer.
- Staff asked about DC specific subgroups including senior citizen and disabled residents; would those be lumped-in with RAD customers as one control group? Brattle stated that it would be interesting to test the group separately, but it would be challenging to meet recruiting targets if they are treated separately, and the pilot cost would be higher. There would be a benefit to redefine LMI to include the senior citizen and disabled group. OPC asked, for the experimental rate, would those customers be incented to reduce or shift usage? That data would be useful in the future. Pepco said that they already presented how they would go through their recruitment process in their previous filing. Brattle stated that it did perform some analysis for this type of group in MD but has not done so in DC yet. OPC reiterated having that analysis would be helpful for the group and for market analysis. If the data can be modeled it would be useful to target the LMI community. Pepco noted that it has not really looked at this track yet. Staff asked if Pepco could provide the average consumption of R, RAD, and Senior Citizen and Disabled residents? Pepco committed to investigating, but cautioned that Senior Citizen and Disabled residents may not be flagged in the system at this time as the applicable Rider is relatively new.

- DCCA clarified their comment about full deployment and pilot: we shouldn't be running a pilot for something we already know. Since we already have experience and knowledge of the effects, a full TOU deployment could go forward and test the variations of the TOU as a pilot. Staff pointed out that we need to have the right rating periods and price signals.
- Pepco stated that it doesn't want to replicate the MD pilot, saying that we could instead be piloting alternatives, such as a demand charge rate side-by-side with TOU. Demand charge is more cost reflective. GRID2.0 strongly advocated for a full deployment for TOU rates for all customers.
- Staff suggested that, given the low percentage of residential customers switching to third party suppliers, it may be easier to focus only on SOS customers. DOEE stated that with enabling devices, the pilot should be available to all customers, with third party suppliers having to switch back to SOS. Those customers and customers without 12 months of historical data should be excluded from the treatment groups, but not from enrolling in the TOU rate. Smart thermostats and smart EV chargers could have incentives, but the money used as incentive should only be used for those customers who are eligible for treatment group analysis.
- DCCA believed that the pilot should be formed based on the goal of the group and what is being tested.
- Staff noted that the reason to exclude medical needs customers is that they would not be able to shift their load, such as using an oxygen machine. GRID2.0 agreed that those wouldn't be included. DCCA assumed that the pilot rate would be revenue neutral, that if there is no behavior change there would not be any cost increase. It will depend on the design; if the rate is designed to be revenue neutral or bill neutral. OPC stated that it would be helpful to have consumption data for these customers. Brattle mentioned that the rates are revenue neutral for an average customer who enrolls in the pilot and does not shift or reduce load, but that customers using more or less energy than the average customer, or who do change usage in response to price signals, may see an increase or decrease of their bills. Pepco reiterated that it would have to look at whether usage data for medical needs customers is available. OPC stated that these particular customers may be some of the customers in most need of assistance and knowing their consumption could help with a program designed to meet that need.
- Pepco asked to clarify stakeholder priorities for what the pilot should test. Pepco suggested having the participants rank the desired goals so that Pepco can gain some clarity on the objective of the pilot as it is being modified. Staff stated that we know the load management capabilities from TOU in other jurisdictions. Many jurisdictions have generation, distribution and transmission TOU rates. We need to test changes to the rating period and specific groups such as senior citizens and disabled residents and find the right price signal. OPC stated that we know what we all want individually, but it has not been written down and identified as a group. OPC further stated that the questions of: (1) Whose behavior are we trying to change? (2) What is the program's ultimate goals? OPC agreed with the

ranking process recommended by Pepco. Staff stated that the WG has a common goal, to start to achieve energy savings in order to help achieve the climate objective. DCCA noted that the other jurisdictions who have already moved to a default TOU have probably already dealt with the questions we are analyzing right now. Staff added that NY had some price guarantee for the first year of the TOU rate. Brattle said that the price protection has not been agreed to in a full deployment, so the pilot should not include price protection either. Pepco asked for clarification on what they should be looking at in order to move forward.

- Staff stated that they want to design a successful pilot, and they will take all the comments and concerns into consideration.
- Pepco presented on its proposed rating periods. Staff asked about the two peaks in winter and the customers on the Direct Load Control ("DLC") program - how would the pilot synchronize with that program? Pepco replied that those customers would not be included in the evaluation of the pilot but could enroll in the rate. DOEE asked why we are only looking at residential peaks instead of system peaks. Peak related costs are based on system peaks. Staff stated that commercial demand response programs in the District provide savings to peak costs. But this is a residential TOU pilot program not commercial TOU program. That is why residential load is analyzed here with two winter peaks. DCCA asked if we are talking about distribution and generation for demand and energy? Pepco noted that both MW and MWh are shown on the graphs.
- In terms of Working Group report, Pepco will start to draft dynamic pricing report and staff will do TOU-pilot. OPC said they need to review the dynamic pricing draft report. The group decides that no survey is needed for dynamic pricing.
- Due to time constraints, Staff moved the remainder of the agenda to the next meeting.

Meeting Action Items

- Staff will circulate the R-PIV survey prior to next meeting.

Next Steps (Revised)

- Draft Minutes Circulated to Participants: Friday, March 12, 2021
- Comments from Participants to PSC Staff: Tuesday, March 16, 2021
- Report Filed with Commission: Monday, March 22, 2021
- Next Meeting: Thursday, March 25, 2021, 10-12pm

Rate Design Working Group (RDWG)

March 4, 2021

ATTENDANCE

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Power Path DC – Rate Design Working Group

1325 G Street, N.W., 8th Floor
Washington, D.C. 20005

Virtual RDWG Meeting
March 4, 2021
10am – 12:30 pm

AGENDA

I. WG Members - Identification

II. Introduction

- **Housekeeping Rules**

III. Presentation

- **Oracle - Time Varying Rates and Behaviors (15 minutes)**

IV. Discussion – Q&A

- **Pepco's R-PIV update (Pepco)**
- **Pepco's rating period charts (Pepco)**
- **Responses to Staff's survey/matrix for TOU pilot (Staff)**
- **Responses to DOEE's survey/matrix for TOU pilot (DOEE)**

V. Next Steps

A. Working Group Minutes

Draft Circulated to Participants:	**March 8, 2021**
Comments from Participants to PSC Staff:	**March 10 , 2021**
Minutes filed with Commission:	**March 15, 2021**
B. Next Meeting	**(TBD)**

ADJOURNMENT

Attachment No. 3

ORACLE

Time Varying Rates and Customer Behaviors

Carolyn Sloan
Manager, Regulatory Affairs & Market Development
Opower
March 4, 2021

ORACLE Utilities

Variable rates have a perception problem

Utility commission

+ Lower system costs

+ Reduced emissions

Utility company

+ Aligned delivery costs

- Angry customers

Utility customer

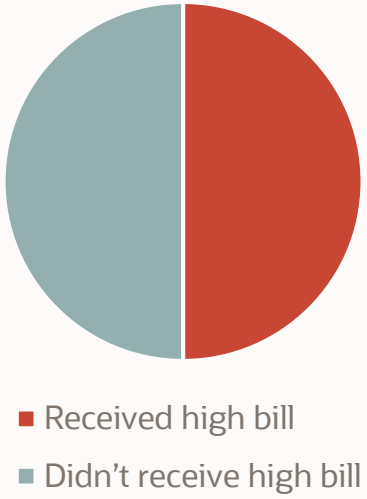
- Confusing rates

- Higher bills

Utility customers don’t understand variable rates

69%

Many think it’s unfair to change prices with demand



Half the customers in a CA peak rebate program didn’t know they were enrolled

2X

Twice as many customers think bills will increase vs. decrease

Opower deeply researched consumer needs & attitudes

Product Design Goals

- Customer satisfaction
- Lower service costs
- Bill savings
- Rate literacy
- Lower peak demand
- Program & product adoption

One solution for rate education, enrollment, and engagement

Educate & Enroll

Engage & Innovate

Rate education reports

Personalized rate recommendations

Web & mobile billing insights

Proactive billing alerts

Behavioral load shaping

Powered by the Opower rate engine

Opower Rates Engagement with Evergy saw positive results

40%

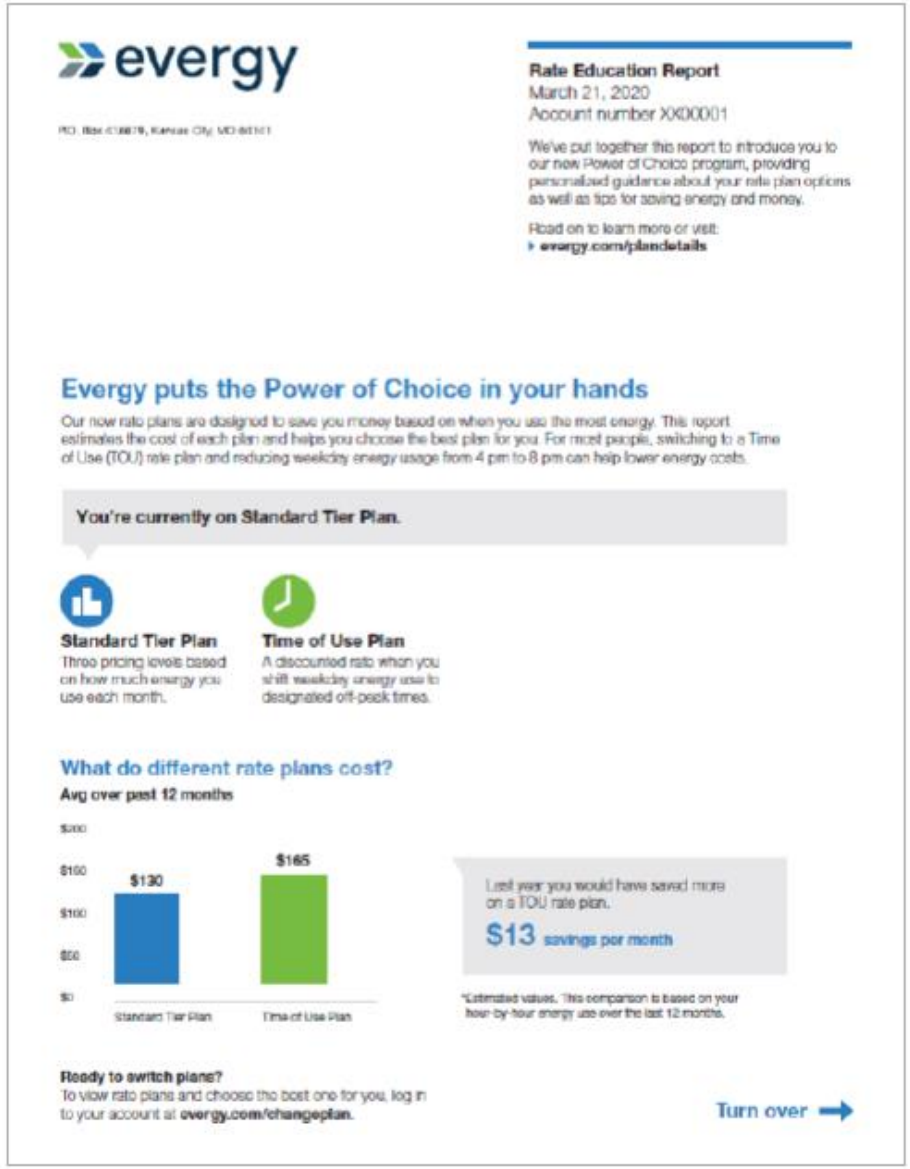
Average unique open rate

Many open multiple times

60%

Customers who opened the digital report spent time reading it

(vs glancing, skimming)



evergy

Rate Education Report
March 21, 2020
Account number XX00001

We've put together this report to introduce you to our new Power of Choice program, providing personalized guidance about your rate plan options as well as tips for saving energy and money.

Read on to learn more or visit:
▸ **evergy.com/plandetails**

Evergy puts the Power of Choice in your hands

Our new rate plans are designed to save you money based on when you use the most energy. This report estimates the cost of each plan and helps you choose the best plan for you. For most people, switching to a Time of Use (TOU) rate plan and reducing weekday energy usage from 4 pm to 8 pm can help lower energy costs.

You're currently on Standard Tier Plan.

Standard Tier Plan
Three pricing levels based on how much energy you use each month.

Time of Use Plan
A discounted rate when you shift weekday energy use to designated off-peak times.

What do different rate plans cost?

Avg over past 12 months

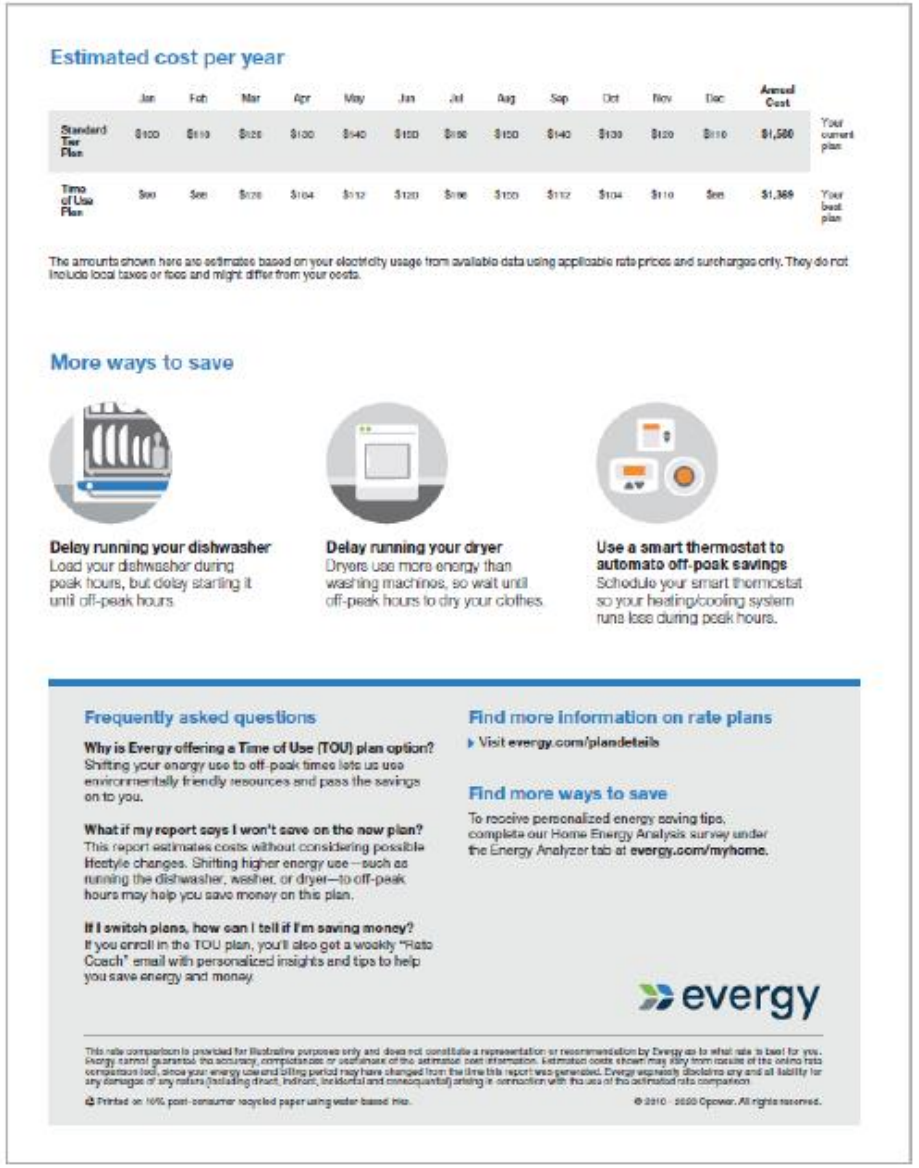
Last year you would have saved more on a TOU rate plan.

$13 savings per month

*Estimated values. This comparison is based on your hour-by-hour energy use over the last 12 months.

Ready to switch plans?
To view rate plans and choose the best one for you, log in to your account at **evergy.com/changeplan**.

Turn over



Estimated cost per year

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Cost	
Standard Tier Plan	$100	$110	$120	$130	$140	$150	$160	$150	$140	$130	$120	$110	$1,580	Your current plan
Time of Use Plan	$90	$95	$120	$104	$112	$120	$136	$120	$112	$104	$110	$96	$1,369	Your best plan

The amounts shown here are estimates based on your electricity usage from available data using applicable rate prices and surcharges only. They do not include local taxes or fees and might differ from your costs.

More ways to save

Delay running your dishwasher
Load your dishwasher during peak hours, but delay starting it until off-peak hours.

Delay running your dryer
Dryers use more energy than washing machines, so wait until off-peak hours to dry your clothes.

Use a smart thermostat to automate off-peak savings
Schedule your smart thermostat so your heating/cooling system runs less during peak hours.

Frequently asked questions

Why is Evergy offering a Time of Use (TOU) plan option?
Shifting your energy use to off-peak times lets us use environmentally friendly resources and pass the savings on to you.

What if my report says I won't save on the new plan?
This report estimates costs without considering possible lifestyle changes. Shifting higher energy use—such as running the dishwasher, washer, or dryer—to off-peak hours may help you save money on this plan.

If I switch plans, how can I tell if I'm saving money?
If you enroll in the TOU plan, you'll also get a weekly "Rate Coach" email with personalized insights and tips to help you save energy and money.

Find more information on rate plans

▸ Visit **evergy.com/plandetails**

Find more ways to save

To receive personalized energy saving tips, complete our Home Energy Analysis survey under the Energy Analyzer tab at **evergy.com/myhome.**

evergy

This rate comparison is provided for illustrative purposes only and does not constitute a representation or recommendation by Evergy as to what rate is best for you. Evergy cannot guarantee the accuracy, completeness or usefulness of the estimated cost information. Estimation costs shown may vary from results of the online rate comparison tool, since your energy use and billing period may have changed from the time this report was generated. Evergy expressly disclaims any and all liability for any damages of any nature (including direct, indirect, incidental and consequential) arising in connection with the use of the estimated rate comparison.

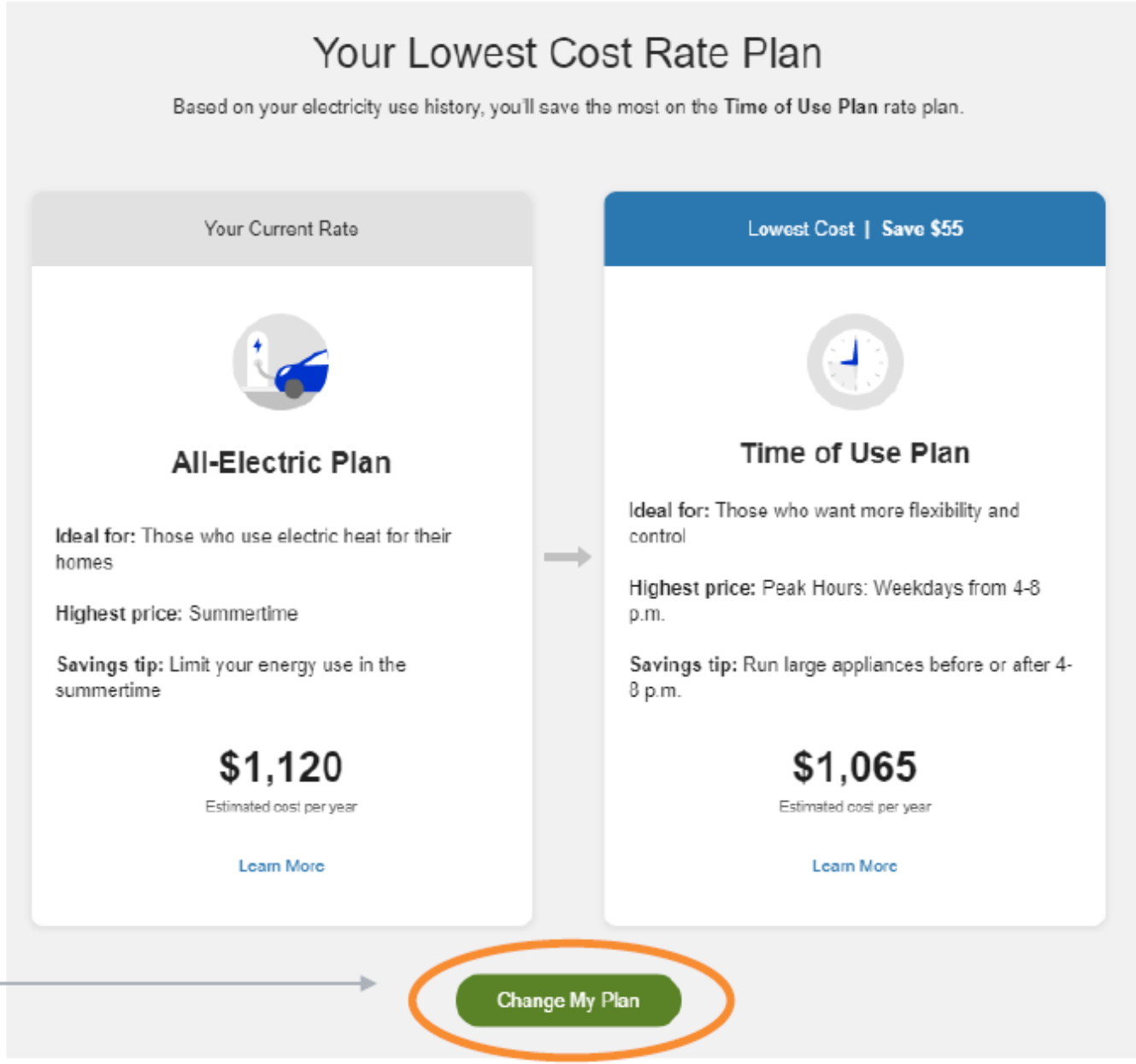
Printed on 10% post-consumer recycled paper using water based inks.

81%

TOU customers looked at Rate Analysis Tool before enrolling

60%

TOU customers clicked “Change My Plan” within the Rate Analysis Tool



Opower BLS live with four US utilities in 2019

result in customers paying higher rates for electricity usage during peak periods, and substantially lower rates during off-peak periods, the Commission finds that using AMI data-enabled messaging can lessen any downside risk and help customers have a successful experience with time-varying rates.

Accordingly, the TOU pilot programs may proceed using the Oracle Behavioral Load Shifting tool.[3] Further, the Rate Design Work Group is directed to continue to work with the Joint Utilities and Oracle to develop and implement, to the extent feasible, the metrics proposed by the Maryland Energy Administration in its Comments.[4]

The Commission also finds that it is sufficient for the Brattle Group to provide its Evaluation, Measurement, and Verification reports on the TOU pilot programs on an annual basis. Separately, the Rate Design Work Group is directed to work with the Joint Utilities to develop, if feasible, metrics to evaluate the impact of the TOU pilots on their respective distribution systems. Finally, the Commission notes that the Joint Utilities represented at the Administrative Meeting that they will address all concerns raised by the Office of People's Counsel.[5]

By Direction of the Commission,

/s/ Terry J. Romine

Terry J. Romine
Executive Secretary

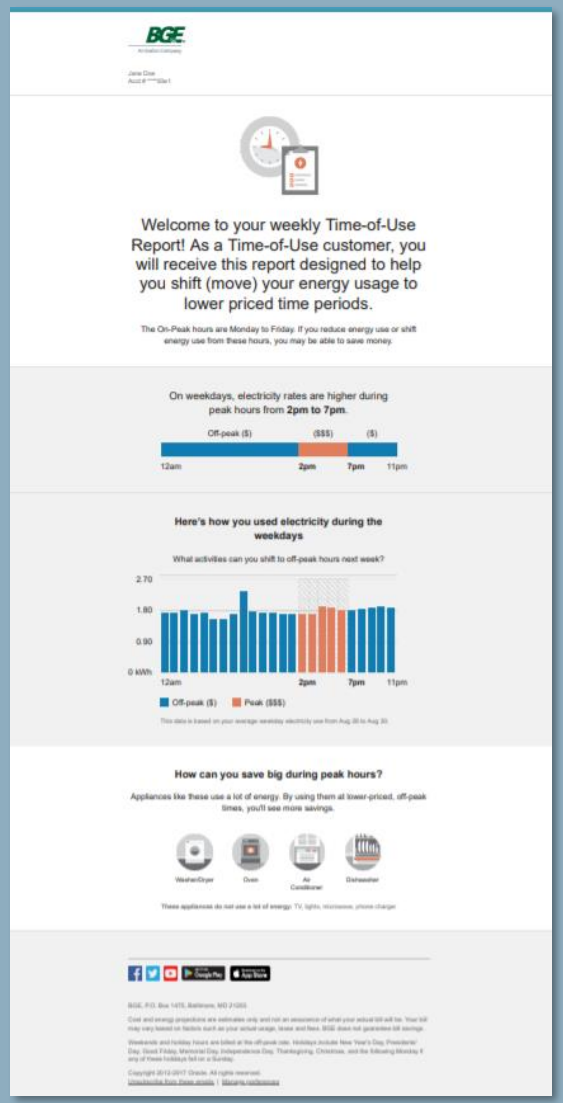
BGE

pepco

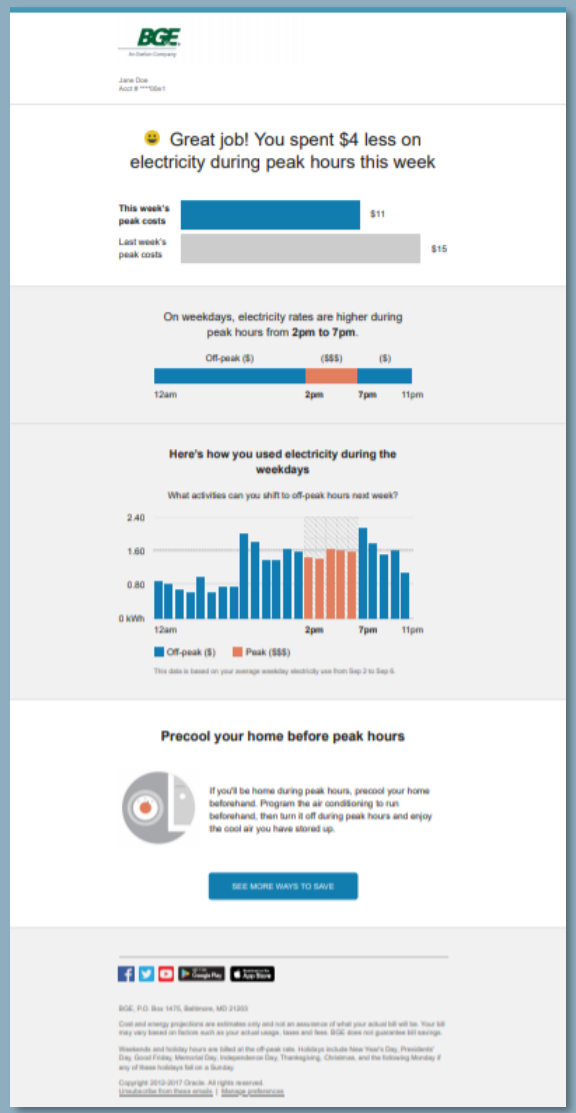
delmarva power

evergy

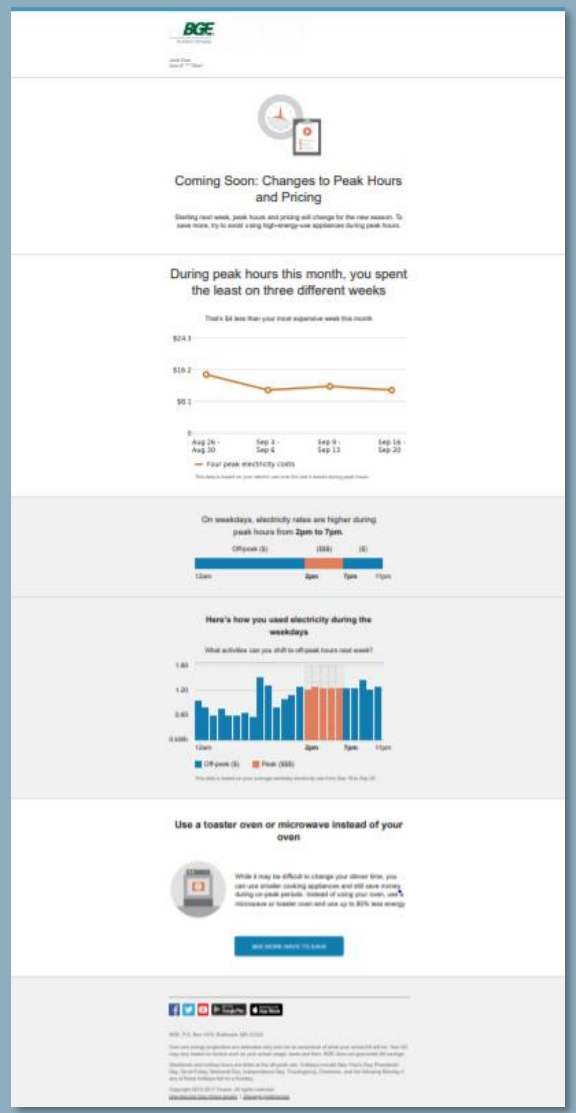
Behavioral Load Shaping Communication Series



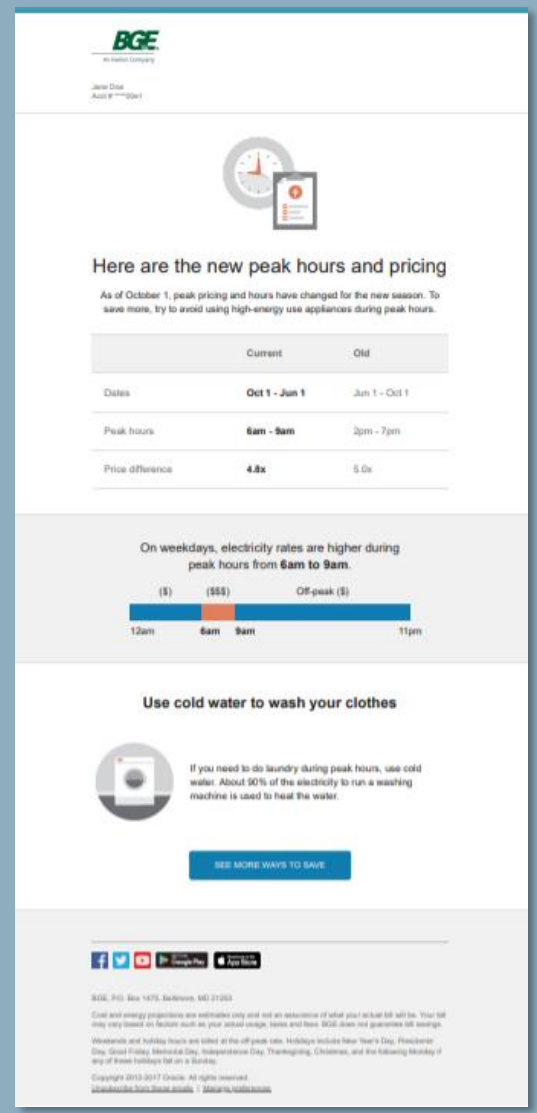
BLS Introduction



Week-Over-Week Coaching



Monthly Summary



Seasonal Transition

BLS in Maryland showed positive results and lessons learned

- Recruitment to new rates can be difficult
- LMI customers did just as well on new rates as other customers
- Structural winners still change their behavior in response to signals

Designed for utility, commission, and customer value

Minimize Customer Risks

- Customer satisfaction
- Lower service costs
- More bill savings

Amplify Results

- Rate literacy
- Peak reduction
- Program adoption

Attachment No. 4

DC Schedule "R-PIV" Status Report

pepco®

An Exelon Company

DC Schedule "R-PIV" Status Report

- February 16 – Pepco filed a Schedule "R-PIV" status report with the Commission on behalf of the Rate Design Working Group, including:
  1. Background on Pepco's revised R-PIV rates approved in August 2020
  2. Stakeholder feedback provided in filings and in RDWG discussions
  3. Pepco's proposed modifications to the R-TOU-P rate design methodology as presented at the last RDWG meeting on January 6, 2021
     - Change how PJM Generation Obligations are allocated between Summer/Winter
     - Design rates using DC Schedule "R" data instead of MD Schedule "R-PIV" data
     - Select new on-peak hours based on DC-specific load and LMP data

	Summer (06/01/2020 – 10/31/2020)	Winter (11/01/2020 – 05/31/2021)
Current R-PIV Ratio	2.46	3.08
+ Generation Obligation Allocation Change	2.83	2.64
+ DC Schedule "R" Data	2.47	2.28
+ Modify On-Peak Hours	**3.68**	**3.47**