BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

Application of Southern California Edison Company (U 338-E) to Establish Marginal Costs, Allocate Revenues, and Design Rates.	A.17-06-030 (Filed June 30, 2017)

MOTION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E), AGRICULTURAL ENERGY CONSUMERS ASSOCIATION, AND CALIFORNIA FARM BUREAU FEDERATION FOR ADOPTION OF AGRICULTURAL AND PUMPING RATE GROUP RATE DESIGN SETTLEMENT AGREEMENT

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Pursuant to Rule 12.1 *et seq* of the California Public Utilities Commission's (Commission's) Rules of Practice and Procedure, Southern California Edison Company (SCE), Agricultural Energy Consumers Association (AECA), and California Farm Bureau Federation (CFBF) (collectively referred to as the Settling Parties),[1] file this motion requesting the Commission find reasonable and adopt the "Agricultural and Pumping (A&P) Rate Group Rate Design Settlement Agreement" (Settlement Agreement), which is appended to this Motion as Attachment A.

I.

INTRODUCTION

The Settling Parties have executed a Settlement Agreement that resolves all issues raised in this proceeding regarding A&P-related tariff matters and rate design issues. The Settlement Agreement reflects both uncontested proposals made by SCE in its application and compromise positions reached by the Settling Parties resulting from good-faith settlement negotiations, in what has been called settlement "Track No. 5" of this proceeding. The Settlement Agreement strikes a reasonable

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1 Pursuant to Rule 1.8(d), SCE has been authorized to file this motion on behalf of the Settling Parties.

compromise and balance between the Commission's rate design principles of rate stability/certainty and bill impact mitigation, on the one hand, and cost causation and cost responsibility, on the other hand.

Section II of this Motion provides the regulatory background for this proceeding. Section III describes the positions advocated by the Parties and the key terms of the Settlement Agreement. Section IV demonstrates that the Settlement Agreement is reasonable in light of the whole record, consistent with law, and in the public interest, and that it should be adopted without modification. Section V discusses the procedural requests of the Settling Parties for disposing of this Motion and implementing revised rates.

II.

REGULATORY BACKGROUND

This proceeding was initiated by SCE's filing of Application (A.) 17-06-030 on June 30, 2017, along with service of SCE's prepared direct testimony regarding marginal costs, revenue allocation, and rate design issues. On November 22, 2017, the Assigned Commissioner and Assigned Administrative Law Judge (ALJ) issued a Scoping Memo and Ruling following a November 2, 2017 prehearing conference. The Scoping Memo identified various A&P rate design issues within the scope of the proceeding, including issues relating to grandfathered rate options, consolidation of rate options, elimination of rates with historical super-off-peak (SOP) periods, and rate-eligibility questions for A&P customers. CFBF and AECA, who specifically represent A&P interests, served their initial testimony on March 22 and 23, 2018, respectively.[2]

SCE provided notice to all parties of its intent to conduct a settlement conference related to all issues raised in the proceeding, and an initial settlement conference was held on April 6, 2018. Continuing settlement discussions on specific issues occurred among the parties after April 6, 2018.

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[2] AECA is a nonprofit organization representing the collective interests of many of the state's leading agricultural associations, and it works on behalf of the combined interests of several county farm bureaus and the individual farmers in more than forty agricultural water districts. AECA represents more than 40,000 California agricultural producers. CFBF is California's largest farm organization, working to protect family farms on behalf of its nearly 40,000 members statewide and as part of a nationwide network of more than 5.5 million members.

Specific to the issues resolved in this Settlement Agreement, the Settling Parties commenced "Track No. 5" settlement discussions on June 6, 2018.

III.

SUMMARY OF POSITIONS AND SETTLEMENT

The Settlement Agreement resolves all issues raised in this proceeding regarding A&P tariff matters and rate design issues. The major issues resolved in this proceeding included:

- **Common Rate Design Elements and A&P Rate Options** – The structure and design of rate options for A&P customers, including rate structure components (*e.g.*, Customer Charges, Energy Charges, Time Related Demand (TRD) Charges, and Facility Related Demand (FRD) Charges); updated time-of-use (TOU) periods and rate options (such as Options D and E, Critical Peak Pricing (CPP), Real Time Pricing (RTP), and other optional TOU periods for Options D and E); and elimination of SOP rate options
- **TOU Period Grandfathering (GF) –** The eligibility for and duration of GF rates, and development of GF rate options and design
- **TOU Period Mitigation –** Rate options and other efforts to help non-GF customers mitigate the impacts associated with the changing TOU periods
- **Enhanced Marketing, Education, and Outreach (ME&O)** – Activities by SCE to provide information regarding the updated TOU periods and rate design for A&P customers
- **Tariff Rule 1 Modifications** – SCE's uncontested proposal to add definitions of "General Water Pumping" and "Sewerage Pumping" to SCE's Tariff Rule 1, Definitions

A summary of the Settling Parties' respective positions on these issues and the manner in which they were resolved in the Settlement Agreement is provided below. Appendix A to the Settlement Agreement also provides a comparison exhibit with additional details regarding the Settling Parties' positions and agreed-upon settlement terms.[3] Appendix B to the Settlement Agreement provides

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[3] Capitalized terms are defined in Paragraph 2 of the Settlement Agreement.

illustrative average rates for each A&P rate option, based upon the terms and principles agreed to in Settlement Agreement.

A. A&P Rate Structure and Rate Options

1. SCE's Position

SCE proposed the following rate options and rate structure for A&P customers:

- Retain Schedules PA-1 and PA-2 for customers located on Catalina Island;
- Offer Option D (formerly Option B) as the default rate for customers in the TOU-PA-2 class, with Option E (formerly A) and Option CPP rates also offered;
- Offer Option CPP as the default rate for customers in the TOU-PA-3 class, as adopted in SCE's 2016 Rate Design Window (RDW) Application (A.16-09-003, D.18-07-006), with Option D and Option E rates also offered;
- Eliminate existing SOP rate options;
- Establish a monthly customer charge of approximately $55 for TOU-PA-2 service and approximately $305 for TOU-PA-3 service. The customer charges have been adjusted to recover a portion of the final line transformer (FLT) costs in the grid distribution demand charge;
- Revise TOU energy, TRD and FRD charges to reflect updated marginal costs and revenue allocations, as described in Exhibits SCE-02 and SCE-03, using the TOU periods adopted in the 2016 RDW;
- Update the voltage discount.

2. CFBF's Position

CFBF proposed the following:

- Alternate rate designs for Options D and E that maintained the existing Customer Charge levels and moderated TOU differentials to mitigate bill impacts and ease customers' transition to the updated TOU periods;
- Allow existing SOP customers to be eligible for service on the solar GF rates and/or take advantage of the other TOU mitigation measures proposed by CFBF;

- The use of 2017 load shapes for the assessment of rate designs and mitigation measures since 2015 was a drought year.

3. AECA's Position

AECA proposed the following:

- Maintain existing Customer Charges at current levels;
- Offer a range of tariff options that (1) rely on time-dependent demand charges for higher load factor customers, (2) depend largely on energy charges for those with intermittent or variable usage, and (3) reward shifting loads to off-peak periods by maintaining substantial peak/off-peak price differentials;
- Keep the existing SOP rate options open (*i.e.*, do not eliminate) and update the rate design for the SOP incentive and on-peak demand charge adder;
- Implement daily demand charges if SCE want to continue to use demand charges.

4. Settlement

a) Common Rate Design Elements

Rate structures for the A&P Rate Group will continue to generally consist of some combination of Customer Charges, TOU or seasonal Energy Charges, TRD Charges and FRD Charges. In accordance with D.18-07-006, CPP[4] will become the default rate option for the TOU-PA-3 class upon implementation of the Settlement Agreement,[5] and will remain available as an option for the other classes within the A&P Rate Group. Optional RTP rates will also remain available for the A&P Rate Group. Finally, accounts eligible for TOU period grandfathering in accordance with D.17-01-006

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4 CPP means a dynamic pricing rate that provides a high, short-term CPP Energy Charge of a predetermined level during 12 events of high load or other high-cost system conditions, as designated by SCE within the approved parameters. Typically, the time and duration of the CPP Energy Charge are predetermined, but the CPP event days are not predetermined. Participating customers receive a credit reflected in summer Demand Charges or Energy Charges, where applicable, on all days when CPP events are not called.

5 Customers must have been served on a TOU rate for at least 24 months before they are eligible to be defaulted to Option CPP. Additionally, customers with pending DA, CCA or CA enrollments are not subject to default CPP, as provided in D.18-07-006.

and D.17-10-018, and existing SOP accounts, will be able to take service on GF-A and/or GF-B, as applicable.

In addition to the common rated design elements, the Settlement Agreement includes estimates for Customer Charges, Energy Charges, TRD Charges, and FRD Charges. When the Settlement Agreement is first implemented in 2019, the estimated charges will be adjusted, as necessary, consistent with the then-current revenues allocated to each rate group in accordance with the Revenue Allocation Settlement Agreement. Thereafter, the estimated charges will be adjusted consistent with Paragraph 4.B.7.a of the Revenue Allocation Agreement when SCE's authorized generation revenues change.

(1) Customer Charges

Customer Charges for the TOU-PA-2 and TOU-PA-3 rate classes shall remain at the currently approved levels when the Settlement Agreement is first implemented, with any balance recovered via the FRD Charge. Thereafter, these Customer Charges will be adjusted consistent with Paragraph 4.B.7.a of the Revenue Allocation Settlement Agreement (submitted on July 3, 2018), when SCE's authorized distribution revenues change. Illustrative monthly Customer Charges are provided in Appendix B of the Settlement Agreement.

(2) Energy Charges

The use of TOU Energy Charges to recover certain generation and distribution revenues is discussed in Section III.A.4(b) below (Rate Options). To mitigate bill impacts and ease the transition of customers to the new TOU periods, certain TOU period rate differentials will be "smoothed" or moderated as part of the settled rate designs.

(3) TRD Charges

The base rate (*i.e.*, Option D) for TOU-PA-2 and TOU-PA-3 will continue to collect certain generation capacity costs via TRD charges. However, to reflect the impact of ramp and the need for flexible capacity year-round, generation capacity TRD charges will apply both in the summer on-peak period (as they currently do) and also in the winter mid-peak period.[6] Additionally, as a first step to introducing time-differentiated distribution rates, a new summer on-peak TRD Charge will apply, which reflects the recovery of approximately 50 percent of the summer Distribution Design Demand Peak-capacity costs. To offer customers a menu of rate options, the "Option E" TOU-PA-2 and TOU-PA-3 rates will not include TRD charges, consistent with the existing Option A structure. Illustrative TRD Charges are shown in Appendix B of the Settlement Agreement.

(4) FRD Charges

Both Options D and E of TOU-PA-2 and TOU-PA-3 (discussed below) will include an FRD Charge, which is designed to recover certain allocated delivery revenues, including SCE's adopted transmission revenues. For distribution-related revenues, the Option D FRD charge is designed to recover the portion of customer marginal costs not recovered via the Customer Charge, approximately 50 percent of Peak-related distribution design demand marginal costs of the mid-, off-, and super-off-peak periods, and all Grid-related distribution design demand marginal costs. For Option E (for distribution), the FRD Charge will recover the portion of customer marginal costs not recovered via the Customer Charge and Grid-related distribution design demand marginal costs. As a result of SCE introducing time-differentiation of distribution rates, the amount of revenue collected via the non-coincident FRD Charge has been reduced from current levels as reflected in Table 4-4 of the Settlement Agreement. Illustrative FRD Charges are shown in Appendix B of the Settlement Agreement.

(5) Voltage Discounts

A&P customers served at higher voltage delivery levels than the design voltage level for their rate class will receive a voltage discount reflecting their lower cost of service. SCE will establish the discount levels based on the difference in marginal costs of service between the design or predominant voltage level for a given rate class and the higher voltage service options. No modifications were proposed for the determination of the voltage discounts.

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[6] TRD charges do not apply on weekends or holidays in the winter mid-peak period.

(6) Power Factor Adjustments

No modifications were proposed for the determination of the power factor adjustment (PFA) rates, which are designed to recover the costs of additional capacitors installed by SCE to improve power factor.

b) Rate Options

(1) Schedules PA-1 and PA-2

SCE's position was uncontested. Therefore, Schedules PA-1 and PA-2 will be retained for customers located on Catalina Island, with rate factors set based on a functional SAPC adjustment using the updated revenue allocation for each class.

(2) Schedule TOU-PA-2

As described in more detail in Section 4.C.2 of the Settlement Agreement, the Settling Parties agreed that SCE will offer a menu of rate options to A&P customers within the TOU-PA-2 class, including Options D and E (with rates that include either a 4-9 pm peak period or an optional 5-8 pm peak period), Option CPP, Option RTP, and GF-A and GF-B rates. The options will incorporate the following:

Option D

- Updated TOU periods as adopted in D.18-07-006;
- Customer Charges set at current levels to moderate bill impacts as customers transition to the new TOU periods, with the recovery of any customer marginal cost deficiencies included in the FRD Charge;
- For distribution, TOU Energy Charges that recover approximately 50 percent of Peak-capacity costs for all TOU periods with smoothing and moderated TOU rate differentials to mitigate bill impacts as customers transition to the new TOU periods and experience time-differentiated distribution, a summer on-peak

TRD Charge that recovers approximately 50 percent of summer Peak-capacity costs, and an FRD Charge that recovers Grid-related costs and 50 percent of the remaining Peak-related costs of the mid-, off-, and super-off-peak periods;

- For generation, TOU Energy Charges that recover generation energy costs and a portion of generation capacity costs not recovered in the TRD Charge, with moderated TOU differentials in the winter to mitigate bill impacts as customers transition to the new TOU rates.

Option E

- Updated TOU periods as adopted in D.18-07-006;
- Customer Charges set at current levels to moderate bill impacts as customers transition to the new TOU periods, with the recovery of any customer marginal cost deficiencies included in the FRD Charge;
- For distribution, TOU Energy Charges that recover all Peak-capacity costs with smoothing and moderated TOU rate differentials to mitigate bill impacts as customers transition to new TOU periods and experience time-differentiated distribution charges, and an FRD Charge that recovers all Grid-related costs;
- For generation, recovery is via TOU Energy Charges, with moderated TOU differentials in the winter to mitigate bill impacts as customers transition to the new TOU rates.

Option CPP

- CPP event periods shall coincide with the updated TOU peak periods (*i.e.*, weekdays from 4-9 pm);

- The revised CPP event charge of \$0.80/kWh shall be phased in over two years – the event charge in the first year (2019) will be \$0.40/kWh and will increase to the full \$0.80/kWh in the second year (2020);
- CPP-Lite and Capacity Reservation Level (CRL) options are eliminated; and
- Bill protection will be offered to customers for up to one year.

Option RTP

- A&P customers will remain eligible for the RTP rate option, with the illustrative rates reflected in Appendix B. No structural changes to the RTP program are proposed in this Agreement, although the changes to RTP resulting from D.18-07-006 will be implemented concurrently with the implementation of a final decision adopting this Agreement.

GF-A and GF-B

- Reflects a settled rate design structure that adheres to the requirements of D.17-01-006.
- Incorporates the following key modifications to SCE's original GF-A proposal:[7]
- Customer Charges are kept consistent with those adopted for the base rate;

[7] In SCE's original proposal, SCE proposed to move the recovery of summer generation capacity revenue from TRD charges into time-differentiated Energy Charges and included a 10 percent differential for generation energy between the highest and lowest-priced TOU periods. SCE also proposed no time-differentiated distribution, with Design Demand Marginal Costs recovered entirely via the FRD Charge.

- Incorporate time-differentiated distribution using a settled set of peak load risk factors (PLRFs) for the portion of distribution recovered via TOU Energy Charges; and
- Modification to how the 10 percent generation rate differential is applied in winter so that the 10 percent differential is based on generation energy only (not generation and capacity).
- Incorporates the following modification to SCE's original GF-B proposal:
- Customer Charges are kept consistent with those adopted for the base rate.

c) Schedule TOU-PA-3

As described in more detail in Section 4.C.3 of the Settlement Agreement, SCE also will offer a similar menu of rate options to A&P customers within the TOU-PA-3 class, including Options D and E (with both a 4-9 pm peak period and an optional 5-8 pm peak period), Option CPP, and GF-A and GF-B rates. The settled rate structure associated with the rate options for TOU-PA-3 is consistent with the rate structure described above for TOU-PA-2.

d) Schedule AP-I

Schedule AP-I will align with the underlying Base Rate attributes adopted in this proceeding, with the credits following the program budget schedule adopted in D.17-12-003. SCE will continue to provide AP-I credits based on the difference between the customer's average on- and mid-peak demand and firm service level.

e) Elimination of the Existing SOP Rate Options

The existing SOP rate options (*i.e.*, Schedules TOU-PA-2-SOP and TOU-PA-3-SOP) will be eliminated, except that (i) Existing SOP Customers will be allowed to take service on GF-A or GF-B until implementation of a final decision in SCE's 2021 GRC Phase 2; (ii) absent an alternative election, Existing SOP Customers will be defaulted to GF-A upon implementation of a final decision in this proceeding; and (iii) all Existing SOP Customers shall be allowed to maintain their separate service connections, as currently allowed for in the existing SOP rate schedules.

B. TOU Period Grandfathering for Solar Customers

1. SCE's Position

SCE proposed that eligibility be limited to customers with behind-the-meter (BTM) solar generating facilities who meet the eligibility requirements of D.17-01-006 and D.17-10-018. SCE also proposed that eligible customers may be served on GF rates from their individual permission to operate (PTO) dates, but not to exceed July 31, 2027 (non-public agencies) or December 31, 2027 (public agencies) as established in D.17-01-006 and D.17-10-018. SCE further proposed the following GF rate options for eligible A&P customers:

- GF-A – intended for accounts in which the eligible non-standby solar system is located behind the same meter as the load;
- GF-B – intended for standby accounts and for NEM-A, VNM and RES-BCT benefiting accounts.

2. CFBF's Position

CFBF agreed that rates using legacy TOU periods are needed for solar customers who are eligible under D.17-01-006 and that the rates must include factors in addition to marginal cost (*i.e.*, maintain directional consistency of legacy TOU periods). CFBF also stated that Customer Charges adopted for the default A&P rate schedules should also be applied to the solar GF rates

3. AECA's Position

AECA did not address this issue in testimony.

4. Settlement

The Settling Parties agreed to the following GF eligibility and duration requirements, and available GF options and rate design.

a) TOU Period Grandfathering – Eligibility

Consistent with the proposal in SCE's Application, A&P customers with BTM solar generation facilities who meet the requirements of D.17-01-006 and D.17-10-018 will be eligible for the relevant GF rates provided in this Agreement, as reflected in the illustrative rates in Appendix B. Additionally, Existing SOP Customers will eligible for the GF rates.

b) TOU Period Grandfathering – Duration

Eligible solar customers may be served on GF rates for 10 years from their individual PTO dates, but not to exceed July 31, 2027 (non-public agencies) or December 31, 2027 (public agencies), as established in D.17-01-006 and D.17-10-018. Existing SOP Customers will be eligible to receive service on the GF rates until the implementation of A&P rates adopted in SCE's 2021 GRC Phase 2. In the event that an Existing SOP Customer also meets the eligibility requirements of D.17-01-006 and D.17-10-018, the Existing SOP Customer will be eligible to remain on a GF rate beyond the implementation of SCE's 2021 GRC Phase 2 for the duration specified in those decisions (*i.e.*, 10 years from PTO date).

c) TOU Period Grandfathering – Available Options

Consistent with the proposal in SCE's Application, eligible A&P customers may elect the following GF rate options: (1) GF-A – intended for accounts in which the eligible non-standby solar system is located behind the same meter as the load; or (2) GF-B – intended for standby accounts and for NEM-A, VNM and RES-BCT benefiting accounts. Existing SOP Customers may elect either of these GF rate options.

d) TOU Period Grandfathering – Rate Design

The agreed-to GF rates are based on updated cost studies with TOU pricing signals based on Legacy TOU Periods. They represent the first step in a multi-step transition toward rates based on current marginal costs. Rate changes made in the attrition years (*i.e.,* before the implementation of SCE's 2021 GRC Phase 2 rates) will be made when SCE's revenue requirements or other revenue allocations change, utilizing SAPC adjustments. Upon implementation of SCE's 2021 GRC Phase 2 rates, the GF rate structures may be further revised as a transition to more cost-based rates.

C. TOU Period Mitigation

1. SCE's Position

SCE did not propose TOU mitigation measures for non-GF customers.

2. **CFBF's Position**

CFBF suggested that possible mitigation measures could include the following:

- Optional rate with 5-8pm peak and moderated TOU differentials;
- Allow customers who have made investments to be eligible for solar GF rates;
- Five percent rate impact bill limiter as a backstop; and/or
- Delay in the mandatory implementation of updated TOU periods.

3. **AECA's Position**

AECA recommended grandfathering A&P customers with inverted load profiles, for ten years on legacy TOU periods with legacy peak differentials.

4. **Settlement**

To help non-GF customers mitigate the impacts associated with the changing TOU periods, SCE will offer:

- A menu of rate options that specifically includes an earlier end to the peak period (*i.e.*, 5-8pm) to address safety and operational concerns;
- Personalized bill impacts and specialized outreach to customers with bill impacts exceeding five percent (based on a comparison of the illustrative rates included in Appendix B and the customers' current rate) beginning in September 2018;[8] and
- Personalized bill impacts and specialized outreach to any Existing SOP Customer with a negative bill impact (based on a comparison of the illustrative rates included in Appendix B and the customers' current rate) and to any Existing SOP Customer who would benefit on one of the new rate options (based on a comparison of the illustrative rates included in Appendix B and the customers' current rate) beginning in September 2018.

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[8] When determining if personalized outreach is necessary during this earlier timeframe, a minimum monthly threshold of $50 shall apply – meaning that if the customer's monthly bill impact is less than $50, SCE is not obligated to (nor precluded from) conducting the personalized outreach.

D. Enhanced ME&O

1. SCE's Position

SCE did not propose any additional ME&O activities beyond those proposed (and adopted) in the 2016 RDW.

2. CFBF's Position

CFBF suggested that SCE should provide a minimum of six months of ME&O / rate analysis tools before implementing the new rates (and if the period was less than 6 months, new rates should be opt-in only). CFBF further suggested that implementation of new rates should take place during January through March to avoid heavy harvest and irrigation seasons. CFBF recommended that SCE complete the following ME&O activities:

- Develop and complete an A&P-specific mass media campaign regarding the new A&P rates, including post-implementation communications;
- Develop and provide rate analysis tools that allow customers to input data and see the impacts of shifting load;
- Provide personalized notification of bill impacts at least three months in advance of new rates; and
- Provide specialized outreach to most impacted A&P customers.

3. AECA

AECA did not address this issue in testimony.

4. Settlement

SCE agreed to develop an A&P-specific ME&O plan in connection with its implementation of the updated TOU periods and A&P rate design. SCE will complete drafting the ME&O plan by the end of August 2018 for implementation beginning in September 2018, with Settling Parties having the opportunity to review and provide input on the plan prior to its finalization. The ME&O plan will include a section on post-implementation communications. SCE will also develop and provide an online rate analyzer tool for A&P customers with messaging indicating that customers can request additional information regarding their available rate option, including the option of having SCE perform manual load-shift analyses.

E. Tariff Rule 1 Modifications

1. SCE's Position

SCE proposed adding definitions for "General Water Pumping" and "Sewerage Pumping" to Tariff Rule 1, Definitions, to provide clarity regarding how these terms apply in Form 14-946, *Affidavit Regarding Eligibility for General Water or Sewerage Pumping*.

2. CFBF and AECA's Positions

CFBF and AECA did not address this issue in their respective testimony.

3. Settlement

SCE's Tariff Rule 1 will be modified to add the following definitions:

- General Water Pumping – a water supply pump or pumping system that supplies water and is not an on-the-farm pump or other system used for agricultural purposes.
- Sewerage Pumping – the use of pumps to pump fluids and/or solid waste through a sewer or water reclamation project.

IV.

REQUEST FOR ADOPTION OF THE SETTLEMENT

The Settlement Agreement is submitted pursuant to Rule 12.1 *et seq*. of the Commission's Rules of Practice and Procedure. The Settlement Agreement is also consistent with Commission decisions on settlements, which express the strong public policy favoring settlement of disputes if they are fair and reasonable in light of the whole record.[9] This policy supports many worthwhile goals, including reducing the expense of litigation, conserving scarce Commission resources, and allowing the Parties to reduce the risk that litigation will produce unacceptable results.[10] As long as a settlement taken as a

[9] *See, e.g.,* D.88-12-083 (30 CPUC 2d 189, 221-223) and D.91-05-029 (40 CPUC 2d 301, 326).
[10] D.92-12-019, 46 CPUC 2d 538, 553.

whole is reasonable in light of the record, consistent with the law, and in the public interest, it should be adopted without change.

The Settlement Agreement complies with Commission guidelines and relevant precedent for settlements. The general criteria for Commission approval of settlements are stated in Rule 12.1(d) as follows:

> The Commission will not approve stipulations or settlements, whether contested or uncontested, unless the stipulation or settlement is reasonable in light of the whole record, consistent with law, and in the public interest.[11]

The Settlement Agreement meets the criteria for a settlement pursuant to Rule 12.1(d), as discussed below.

The prepared testimony, the Settlement Agreement itself (with its attendant Comparison Exhibit attached thereto), and this motion contain the information necessary for the Commission to find the Settlement Agreement reasonable in light of the record. Prior to the settlement, parties conducted discovery and served testimony on the issues related to A&P rate design and TOU period mitigation issues. The Settling Parties request that the Commission admit the prepared testimony and related exhibits into the Commission's record of this proceeding.

The Settlement Agreement represents a reasonable compromise of the Settling Parties' positions in light of the inherent risks and costs of continued litigation. Without divulging the content of confidential settlement negotiations, concessions by parties on some issues were offset by concessions by other parties on other issues, as is the case with almost every settlement. The agreed-upon rate design proposals carefully considered the impact to agricultural customers who have modified operations and made investments to adapt to the existing TOU periods and the operational challenges unique to agricultural customers that will be required in the adjustment to the new TOU periods. In this proceeding, the package of A&P rate options balances the transition to new costs and structures without penalizing the class of customers for good-faith investments. The Settlement Agreement accordingly represents a series of reasonable tradeoffs and must be viewed as a "package." No single provision

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[11] *See also*, *Re Commission's Rules of Practice and Procedure,* (D.87-11-053), 26 CPUC 2d 96.

should be viewed in isolation, although every individual provision is reasonable, lawful, and in the public interest. In summary, the Settlement Agreement is a reasonable resolution of the following subject areas:

1. A&P Rate Structure and Rate Options

The Settling Parties have agreed to thoughtful, balanced rate design proposals for A&P customers.

Some of SCE's rate design proposals were uncontested by CFBF or AECA. These include SCE's proposals for: (1) Schedules PA-1 and PA-2, which SCE proposed be retained for customers located on Catalina Island, and (2) Schedule AP-I, which SCE proposed align with the underlying Base Rate attributes adopted in this proceeding, with credits following the program budget schedule adopted in D.17-12-003. The uncontested proposals strike a correct balance and are consistent both with the Commission's rate design principles (rate stability, bill impact mitigation, cost causation, and cost responsibility) and Commission decisions in other rate proceedings. Further, SCE's detailed testimony, and the fact that these proposals were uncontested further demonstrates the reasonableness of the proposals.

The Settling Parties reached reasonable compromises on contested A&P rate structure and design issues, including agreement on: (1) various rate structures for the A&P Rate group regarding Customer Charges, TOU or seasonal Energy Charges, TRD Charges, and FRD Charges; (2) several rate options for Schedule TOU-PA-2 and Schedule TOU-PA-3; and (3) eliminating existing SOP rate options.

a) Treatment of Charges Is Reasonable

The agreed-upon treatment Customer Charges and Energy Charges for the TOU-PA-2 and TOU-PA-3 will mitigate bill impacts and ease the transition of A&P customers to the new TOU periods. This will help facilitate their acceptance of the new TOU periods and rate design.

The agreed-upon rate structure under the Settlement Agreement also provides for the recovery of distribution design demand marginal costs (excluding the customer charge revenues) via Energy, TRD and FRD Charges as compared to the current state, which provides for recovery of these costs via FRD Charges only. This new rate structure represents significant progress in time-differentiating distribution rates and recovering more coincident costs via coincident (*i.e.*, non-FRD) charges. Settlement Agreement, Table 4-4 provides a comparison of distribution revenue recovery under existing rate structures versus under the Settlement Agreement.

b) Rate Options Are Reasonable

The settlement also includes a menu of rate options – including Option D (4-9 pm and 5-8 pm peak period options), Option E (4-9 pm and 5-8 pm peak period options), Option CPP, Option RTP, Option GF-A, and Option GF-B – for A&P customers to elect depending upon their electrical needs. This optionality provides A&P customers additional flexibility and an opportunity to mitigate bill impacts, and will ease their transition to the new TOU periods and rate designs adopted in the Settlement Agreement.

c) Elimination of SOP Rate Options

The elimination of existing SOP rate options is necessary and reasonable because the TOU periods do not align with the new winter SOP period adopted in the 2016 RDW, which provides an SOP period for all customers. The Settlement Agreement also provides reasonable mitigation on this issue by allowing Existing SOP Customers to take service on GF-A or GF-B until implementation of a final decision in SCE's 2021 GRC Phase 2. In addition, all Existing SOP Customers will be allowed to maintain their separate service connections. SCE will also provide specialize ME&O to Existing SOP Customers to explain the new rate options and elimination of the existing SOP rate option. As with other components of the Settlement Agreement, this will help mitigate bill impacts and help ease transition to the new TOU periods and rate designs adopted in the Settlement Agreement.

2. TOU Period Grandfathering (for Solar and SOP Customers)

The agreed-up TOU period grandfathering provides reasonable eligibility and duration terms of 10 years for A&P customers with qualifying BTM solar generation facilities, because these terms adhere to the requirements established in D.17-01-006 and D.17-10-018. As explained above, Existing SOP Customers will also be allowed to take service on the GF rates until the implementation of

SCE's 2021 GRC Phase 2. This grandfathering period again will help mitigate bill impacts and help ease the transition to the new TOU periods and rate designs.

3. TOU Period Mitigation

The agreed-upon TOU period mitigation is reasonable as it will help customers mitigate the impacts associated with the changing TOU periods. The rate options included in the Settlement Agreement that specifically include an earlier end to the peak period (*i.e.*, 5-8pm) help address safety and operational concerns expressed by certain A&P customers. It is important to acknowledge these concerns. The personalized bill impacts and specialized outreach that SCE will perform for the most impacted customers will help these customers determine an appropriate rate option for their electrical needs and identify ways to potentially modify their usage profiles to take advantage of the new winter-long SOP period.

4. Enhanced ME&O

The agreement for SCE to provide A&P-specific ME&O is reasonable. The requirement for SCE to complete drafting the ME&O plan by the end of August 2018 and implement it in September 2018 will provide sufficient time for SCE to complete its ME&O activities prior to implementing new rates. The online rate analyzer tool that SCE has agreed to provide for A&P customers, along with the manual analysis that SCE will provide prior to the availability of the tool, will allow these customers to obtain additional information regarding their available rate options. All of these activities will help A&P customers make reasonable, informed choices about their rate options.

5. Tariff Rule 1 Modifications

Finally, it is reasonable to add definitions for "General Water Pumping" and "Sewerage Pumping" to Tariff Rule 1, Definitions, because the definitions will provide greater clarity regarding how these terms apply in Form 14-946, *Affidavit Regarding Eligibility for General Water or Sewerage Pumping*.

B. The Settlement Agreement is Consistent with the Law

Every provision of the Settlement Agreement is lawful. The Settling Parties believe that the terms of the Settlement Agreement comply with all applicable statutes and prior Commission decisions, and reasonable interpretations thereof, especially D.17-01-006, D.17-10-018 and D.18-07-006. The collection of more time-dependent distribution revenues via coincident charges, as opposed to non-coincident charges, aligns with the direction specified by the Commission in D.17-08-030.[12] In agreeing to the terms of the Settlement Agreement, the Settling Parties have explicitly considered the relevant statutes and Commission decisions and believe that the Commission can approve the Settlement Agreement without violating applicable statutes or prior Commission decisions.

C. <u>The Settlement Agreement Is in the Public Interest</u>

The Settlement Agreement is in the public interest and in the interests of SCE's A&P customers. The Settlement Agreement is a reasonable compromise of the Settling Parties' respective positions, as summarized in Section III. The Settlement Agreement fairly resolves A&P rate design issues raised in this proceeding, and provides greater certainty to A&P customers regarding their present and future costs, which is in the public interest.

The Settlement Agreement, if adopted by the Commission, avoids the cost of further litigation, and frees up Commission resources for other proceedings. Given that the Commission's workload is extensive, the impact on Commission resources is important.

D. <u>The Settlement Agreement Should Be Adopted as a Whole as It Is a Compromise of Interests</u>

Each portion of the Settlement Agreement is dependent upon the other portions of the Settlement Agreement. Changes to one portion of the Settlement Agreement would alter the balance of interests and the mutually agreed-upon compromises and outcomes that are contained in the Settlement Agreement. As such, the Settling Parties request that the Settlement Agreement be adopted as a whole by the Commission, as it is reasonable in light of the whole record, consistent with law, and in the public interest.

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[12] *See e.g.,* Conclusion of Law (COL) 13.

V.

PROPOSED SCHEDULE FOR COMMENTS AND IMPLEMENTATION OF SETTLEMENT AGREEMENT

The Settling Parties seek approval of the terms of the Settlement Agreement so that SCE may implement rates as soon as practicable following the issuance of a final Commission decision approving the Settlement Agreement but no earlier than January 1, 2019. To accomplish this, the Settling Parties recommend the following time periods provided by Rule 12.2 for comments and replies to comments on the Settlement Agreement. To accommodate questions about the Settlement Agreement, in the event that there are material contested issues of fact, or questions from the Commission following the filing of comments, the Settling Parties request that a portion of one day be scheduled for a hearing (with a panel of sponsoring witnesses) in accordance with the following schedule.

Event	Date
Motion filed for Adoption of the Settlement Agreement	August 3, 2018
Opening comments, if any, on the Settlement Agreement	August 23, 2018
Reply comments, if any, on the Settlement Agreement	September 7, 2018
Hearing on the Settlement Agreement, if necessary	During the currently-reserved time period for evidentiary hearings (*i.e.*, August 9, 2018).

VI.

<u>CONCLUSION</u>

WHEREFORE, the Settling Parties respectfully request that the Assigned Commissioner, Assigned ALJs, and the Commission:

1. Approve the attached Settlement Agreement as reasonable in light of the record, consistent with law, and in the public interest; and

2. Authorize SCE to implement changes in rates and tariffs in accordance with the terms of the Settlement Agreement.

Respectfully submitted,

FADIA R. KHOURY
WALKER A. MATTHEWS

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By: Walker A. Matthews

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And on behalf of the Settling Parties.

August 3, 2018

Appendix A

Agricultural And Pumping Rate Group Design Settlement Agreement

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

Application of Southern California Edison Company (U 338-E) to Establish Marginal Costs, Allocate Revenues, and Design Rates.	A.17-06-030 (Filed June 30, 2017)

AGRICULTURAL AND PUMPING RATE GROUP RATE DESIGN SETTLEMENT AGREEMENT

Dated: **August 3, 2018**

Agricultural and Pumping Rate Group Rate Design Settlement Agreement

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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

Application of Southern California Edison Company (U 338-E) to Establish Marginal Costs, Allocate Revenues, and Design Rates.	A.17-06-030 (Filed June 30, 2017)

AGRICULTURAL AND PUMPING RATE GROUP RATE DESIGN SETTLEMENT AGREEMENT

This Agricultural and Pumping (A&P) Rate Group Rate Design Settlement Agreement (Agreement or Settlement Agreement) is entered into by and among Southern California Edison Company (SCE), the Agricultural Energy Consumers Association (AECA), and the California Farm Bureau Federation (CFBF) (collectively referred to hereinafter as Settling Parties).

1. Parties

A. SCE is an investor-owned public utility and is subject to the jurisdiction of the California Public Utilities Commission (Commission or CPUC) with respect to providing electric service to its CPUC-jurisdictional retail customers.

B. AECA is a nonprofit organization representing the collective interests of many of the state's leading agricultural associations, and it works on behalf of the combined interests of several county farm bureaus and the individual farmers in more than forty agricultural water districts. AECA represents more than 40,000 California agricultural producers.

C. CFBF is California's largest farm organization, working to protect family farms on behalf of its nearly 40,000 members statewide and as part of a nationwide network of more than 5.5 million members.

2. **Definitions**

When used in initial capitalization in this Settlement Agreement, whether in singular or plural, the following terms shall have the meanings set forth below or, if not set forth below, then as they are defined elsewhere in this Settlement Agreement:

A. "Agricultural and Pumping Rate Group" refers to accounts, generally with demands equal to or less than 500 kW,[1] that are eligible for service on the following SCE rate schedules: PA-1 and PA-2 (applicable to non-TOU A&P customers served on Catalina Island), TOU-PA-2 (applicable to A&P customers with monthly demands up to 199 kW), and TOU-PA-3 (applicable to A&P customers of demands of 200 kW to 500 kW, unless exempted from the 500 kW threshold in which case demands can exceed 500 kW).

B. "AP-I" or "Agricultural and Pumping – Interruptible" is a program that provides a year-round monthly credit to eligible A&P customers with a measured demand of 37 kW or greater, or with at least 50 horsepower of connected load, who allow SCE to temporarily interrupt electric service based on terms and conditions provided in the schedule.

C. "Base Rate" means the rate option (*i.e.,* Option D under this Agreement) in a rate class *(i.e.,* TOU-PA-2 or TOU-PA-3) against which all other options within the rate group are designed to be revenue-neutral.

D. "BTM" means behind-the-meter.

E. "CA" means Community Aggregator.

F. "CCA" means Community Choice Aggregation.

[1] Under the current Commission-approved tariffs, there are certain limited exceptions that permit or mandate some accounts with demands greater than 500 kW to take service on A&P schedules. Individual water agencies or other water pumping accounts that have 70 percent or more of the water they pump used for agricultural purposes are required to take service on A&P schedules even if their demands exceed 500 kW. Pursuant to Decision (D.)13-03-031, certain customers whose demands exceed 500 kW may elect to take service on agricultural rate schedules, and they are listed in three categories in the Rule 1 definition (packers of whole fruits and vegetables, nut hullers and shellers, cotton ginners, and certain fluid milk producers). Pursuant to D.18-01-012, the Applicability section of the TOU-PA-3 tariffs was revised to remove the 500 kW maximum demand threshold for any customer who meets SCE's Tariff Rule 1 definition of "Agricultural Power Service."

G. "Commission" or "CPUC" means the California Public Utilities Commission.

H. "Critical Peak Pricing" or "CPP" means a dynamic pricing rate that provides a high, short-term, CPP energy charge of a predetermined level during 12 events of high load or other high-cost system conditions, as designated by SCE within the approved parameters. Typically, the time and duration of the CPP Energy Charge are predetermined, but the CPP event days are not predetermined. Participating customers receive a credit reflected in summer Demand Charges or Energy Charges, where applicable, on all days when CPP events are not called.

I. "Customer Charges" mean the fixed dollar-per-month charges applied to customers[2] in the A&P Rate Group that are designed to recover the fixed customer costs of connection to SCE's system.

J. "DA" means Direct Access.

K. "Default Rate" means the rate option on which a customer is automatically placed when starting service unless the customer requests otherwise.

L. "Demand Charges" mean those charges that are comprised of Facilities-Related Demand (FRD) Charges and Time-Related Demand (TRD) Charges, which are based on a customer's maximum kilowatt (kW) in any time period (*i.e.*, FRD), or during a specified time-of-use (TOU) period (*i.e.*, TRD), within the billing period. Demand Charges recover a portion of SCE's delivery and generation costs, where such charges apply to a specific rate schedule.

M. "Design Demand Marginal Costs" means the incremental cost associated with providing additional capacity on the distribution system.

N. "Distribution Grid" (or "Grid") refers to the portion of DDMCs that are not Distribution Peak related.

O. "Distribution Peak" (or "Peak") refers to the portion of DDMCs that are primarily sized to support the time-sensitive nature of coincident peak demand on the distribution system.

P. "Energy Charges" mean dollar-per-kilowatt-hour (kWh) charges that recover (1) the portion of SCE's generation services revenues not recovered in TRD Charges; (2) the portion of SCE's

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[2] The term "customer" as used in this Agreement generally refers to a service account when used in the context of eligibility and the rates for a particular tariff or rate schedule.

delivery services revenues that are not recovered in TRD Charges, FRD Charges or Customer Charges; and (3) other delivery services revenues for public purpose programs (including Energy Efficiency and CARE), New System Generation Service (NSGS), Nuclear Decommissioning, California Department of Water Resources (DWR) bonds, and CPUC reimbursement fees. Energy Charges are designed to provide a price signal aligned with marginal cost differentials in TOU Energy Charges, where TOU Energy Charges apply to a particular rate schedule.

Q. "EPMC" means equal percent of marginal cost. Because marginal cost revenues do not equal the utility's revenue requirement, in general, the utility revenue requirement is allocated to different rate groups in proportion to each rate group's percentage share of marginal cost revenue responsibility by function (*i.e.,* separately for generation versus distribution, and customer).

R. "ERRA" means Energy Resource Recovery Account.

S. "Existing Super-Off-Peak (SOP) Customer" means a customer with an account served on Schedule TOU-PA SOP or TOU-PA-3 SOP as of the date that this Agreement is submitted for approval (*i.e.,* August 3, 2018).

T. "Facilities-Related Demand Charges" or "FRD Charges" mean the charges applied to customers' monthly peak demands that are not differentiated by TOU or by season, and that are designed to recover certain transmission and distribution costs that are defined to be unrelated to time of use.

U. "Functional SAPC Allocation" means allocation of SCE's revenue requirement to each of SCE's rate groups based on the system average percentage change (SAPC) for the particular function, *e.g.*, generation, or distribution and customer costs.

V. "GF" means grandfathered.

W. "GF-A" means Grandfathered Schedule A rates. GF-A rates are intended for eligible GF accounts where the non-standby solar system is located behind the same meter as the load, and for eligible SOP accounts.

X. "GF-B" means Grandfathered Schedule B rates. GF-B rates are intended for GF standby accounts, GF accounts that are virtually allocated credits under one of the virtual net energy metering (VNM) or RES-BCT tariff options, and for eligible SOP accounts.

Y. "Large Water Agency" means an individual water agency account with demands above 500 kW, or other water pumping accounts with demands above 500 kW, that use 70 percent or more of the water pumped for agricultural purposes.

Z. "Legacy TOU Periods" means the TOU periods currently in effect for A&P customers, including a summer weekday noon to 6 p.m. on-peak period.

AA. "LOLE" means "Loss of Load Expectation," and it represents the expectation that available generation capacity will be inadequate to supply customer demand at any given moment.

BB. "MECs" means Marginal Energy Costs.

CC. "PLRF" means "Peak Load Risk Factor," and represents the methodology used to assess capacity constraints on the distribution system and to assign peak-capacity-related design demand marginal costs to TOU periods.

DD. "PTO" means permission to operate.

EE. "Revenue Allocation Settlement Agreement" refers the Revenue Allocation Settlement Agreement filed in this proceeding on July 3, 2018, concurrent with a motion to approve the settlement. On July 12, 2018, parties to the Revenue Allocation Settlement Agreement submitted an amended motion for adoption of the settlement.

FF. "RECC" or "Real Economic Carrying Charge" means a constant payment in real dollars that includes the recovery of capital investment, earnings, taxes and other capital carrying costs. The RECC, when escalated at the rate of inflation over the life of the asset, recovers the net present value of revenue requirement of a utility investment. It also represents the value of deferring a utility investment by a year.

GG. "Standby service" means SCE's retail service to customers who supply a part or all of their electrical requirements from an onsite generating facility as defined, interconnected, and operated in accordance with SCE's Rule 21, Wholesale Distribution Access Tariff (WDAT) or Transmission Owners (TO) tariff, but who will require electric service from SCE's electrical system during periods of a partial or complete outage of the customer's generating facility.

HH. "Time-Related Demand Charges" or "TRD Charges" are generation or distribution marginal cost-based, capacity-related charges assigned to TOU periods based on loss-of-load probabilities during the TOU periods.

II. "TOU" means time-of-use. TOU periods are the time periods established for the provision of electric service in which TRD Charges or Energy Charges may vary in relation to the cost of service, and reflect the TOU periods adopted in D.18-07-006 (the final decision in SCE's 2018 Rate Design Window (RDW) proceeding).

3. <u>Recitals</u>

A. In Phase 2 of SCE's 2018 General Rate Case (GRC), the Commission allocates SCE's authorized revenue requirement among rate groups and authorizes rate design changes for rate schedules in each rate group.

B. On June 30, 2017, SCE served its initial prepared testimony regarding marginal costs, revenue allocation and rate design in Application (A.) 17-06-030.

A. On August 7, 2017, AECA and CFBF submitted separate protests citing their intention to focus on ensuring that revenue allocation and rate design for agricultural customers are equitable. Both AECA and CFBF have expressed concern that recent drought years in California may have triggered false indicators for cost allocation to the agricultural customer class.

B. On November 22, 2017, the Assigned Commissioner and Assigned Administrative Law Judge issued a Scoping Memo and Ruling following a November 2, 2017 prehearing conference.

C. ORA served its initial testimony on February 16, 2018, but did not address A&P rate design issues. Intervenors, including CFBF and AECA, served their initial testimony on revenue allocation and/or A&P rate design issues on March 22 and 23, 2018, respectively.

D. SCE provided notice to all parties of its intent to conduct a settlement conference, and an initial settlement conference was held on April 6, 2018.

E. Continuing settlement discussions occurred among the Settling Parties after April 6, 2018.

F. In connection with settlement discussions among the Settling Parties, SCE used 2017 billing determinants for bill impact analyses provided in connection with this Agreement.

G. The Settling Parties have evaluated the impacts of the various proposals in this proceeding, desire to resolve all issues related to the design of SCE's A&P rates, and have reached agreement as indicated in Paragraph 4 of this Agreement.

H. Appendix A to this Agreement provides a comparison of the Settling Parties' positions related to A&P rate design issues that have been resolved by this Agreement. In the event of a conflict between the terms of this Agreement and Appendix A, the terms of this Agreement shall control.

I. Appendix B provides illustrative A&P rates resulting from this Settlement Agreement. Consistent with Paragraph 11 of this Settlement Agreement, these class average summaries are for illustrative purposes only and have no precedential value. The rate summaries will be adjust to reflect SCE's actual revenue requirements in accordance with the provisions of the Revenue Allocation Settlement Agreement when rates are first implemented pursuant to the provisions of this Agreement.

4. Agreement

In consideration of the mutual obligations, covenants and conditions contained herein, the Settling Parties agree to the terms of this Settlement Agreement. Nothing in this Settlement Agreement shall be deemed to constitute an admission by any party that its position on any issue lacks merit or that its position has greater or lesser merit than the position taken by any other Party. This Settlement Agreement is subject to the express limitation on precedent described in Paragraph 11. Unless specifically stated otherwise herein, this Agreement and its terms are intended to remain in effect from the date rate changes are implemented as a result of a Commission decision in this proceeding until a decision is implemented in Phase 2 of SCE's next GRC.

A. Illustrative Rates

The Settling Parties agree that the results of the rate design process illustrated by the rate schedules in Appendix B to this Agreement are reasonable. These rates are based on the A&P Rate Group's share of the estimated consolidated revenue requirement of $11,420 million described in more detail in Paragraph 4.B(1) of the Revenue Allocation Settlement Agreement. These illustrative rates shall be adjusted consistent with the terms of this Agreement and the CPUC's decision in this proceeding related to the Revenue Allocation Settlement Agreement to reflect SCE's total system revenue requirement when this Agreement is implemented.

B. Common Rate Design Elements

Consistent with SCE's Application, rate structures for the A&P Rate Group will continue to generally consist of some combination of Customer Charges, TOU or seasonal Energy Charges, TRD Charges and FRD Charges. In accordance with D.18-07-006, CPP will become the default rate option for the TOU-PA-3 rate class upon implementation of this Agreement,[3] and will remain available as an option for the other classes within the A&P Rate Group. Optional real-time pricing (RTP) rates also remain available for the A&P Rate Group. Finally, accounts eligible for TOU period grandfathering in accordance with D.17-01-006 and D.17-10-018 (TOU OIR decisions), and existing SOP accounts, are able to take service on GF-A and/or GF-B, as applicable.

1) Customer Charges

To mitigate bill impacts and help enable customer acceptance of the new TOU periods, Customer Charges for the TOU-PA-2 and TOU-PA-3 rate classes shall remain at the currently approved levels when this Agreement is first implemented, with any balance recovered via the FRD Charge. Thereafter, these Customer Charges shall be adjusted consistent with Paragraph 4.B.7.a of the Revenue Allocation Settlement Agreement when SCE's authorized distribution revenues change. Illustrative monthly Customer Charges are listed in Table 4-1 below:

[3] Customers must have been served on a TOU rate for at least 24 months before they are eligible to be defaulted to Option CPP. Additionally, customers with pending DA, CCA or CA enrollments are not subject to default CPP, as provided in D.18-07-006.

Table 4-1
Illustrative Monthly Customer Charges

Rate Class	Customer Charge
PA-1	$43.15
PA-2	$43.15
TOU-PA-2	$43.15
TOU-PA-3	$217.03

2) Energy Charges

The use of TOU Energy Charges to recover certain generation and distribution revenues is discussed in the Available Rate Options section below. To mitigate bill impacts and ease the transition of customers to the new TOU periods, certain TOU period rate differentials were "smoothed" or moderated as part of the settled rate designs. When this Agreement is first implemented in 2019, these illustrative Energy Charges shall be adjusted, as necessary, consistent with the then-current revenues allocated to each rate group in accordance with Revenue Allocation Settlement Agreement. Thereafter, Energy Charges shall be adjusted consistent with Paragraph 4.B.7.a of the Revenue Allocation Settlement Agreement when SCE's authorized revenues change.

3) TRD Charges

The base rate (*i.e.*, Option D) for TOU-PA-2 and TOU-PA-3 will continue to collect certain generation capacity costs via TRD charges. However, to reflect the impact of ramp and the need for flexible capacity year-round, generation capacity TRD charges shall apply both in the summer on-peak period (as they currently do) and also in the winter mid-peak period.[4] Additionally, as a first step to introducing time-differentiated distribution rates, a new summer on-peak TRD Charge shall apply, which reflects the recovery of approximately 50 percent of the summer Distribution Design Demand Peak-

[4] TRD charges do not apply on weekends or holidays in the winter mid-peak period.

capacity costs. To offer customers a menu of rate options, the "Option E" TOU-PA-2 and TOU-PA-3 rates do not include TRD charges, consistent with the existing Option A structure. Illustrative TRD Charges are shown in Table 4-2 below.

Table 4-2
Illustrative TRD Charges ($/kW)

Rate Class	Summer On-Peak (Generation)	Summer On-Peak (Distribution)	Winter Mid-Peak (Generation)
TOU-PA-2	10.60	2.55	1.86
TOU-PA-3	10.76	2.68	1.91

When this Agreement is first implemented in 2019, these estimated TRD Charges shall be adjusted, as necessary, consistent with the then-current revenues allocated to each rate group in accordance with the Revenue Allocation Settlement Agreement. Thereafter, these estimated TRD Charges shall be adjusted consistent with Paragraph 4.B.7.a of the Revenue Allocation Agreement when SCE's authorized generation or distribution revenues change.

4) FRD Charges

Both Options D and E of TOU-PA-2 and TOU-PA-3 include an FRD Charge, which is designed to recover certain allocated delivery revenues, including SCE's adopted transmission revenues. For distribution-related revenues, the Option D FRD charge is designed to recover the portion of customer marginal costs not recovered via the Customer Charge, approximately 50 percent of peak-related Distribution Design Demand marginal costs of the mid-peak, off-peak, and SOP periods, and all Grid-related Distribution Design Demand marginal costs. For Option E (for distribution), the FRD Charge recovers the portion of customer marginal costs not recovered via the Customer

Charge and Grid-related Distribution Design Demand marginal costs. Illustrative FRD Charges are shown in Table 4-3 below.[5]

Table 4-3
Illustrative FRD Charges ($/kW)

Rate Class	Option D	Option E
TOU-PA-2	8.90	7.59
TOU-PA-3	9.18	7.84

When this Agreement is first implemented in 2019, the estimated FRD Charges shall be adjusted, as necessary, consistent with SCE's then-current authorized revenues and the Revenue Allocation Settlement Agreement. The distribution component of the estimated FRD Charges shall be adjusted, as necessary, by the appropriate SAPC distribution scalar when SCE's authorized revenues change. Similarly, the transmission component of the estimated FRD Charges shall be adjusted, as necessary, by the appropriate Federal Energy Regulatory Commission (FERC) formula rate adjustment when FERC-authorized transmission revenues change.

To demonstrate the impact of incorporating time-differentiated distribution charges in rates as part of this Agreement, Table 4-4 below provides a comparison of the amount of distribution revenue recovery included in Energy Charges, TRD Charges and FRD Charges for the existing A&P rates (*i.e.*, Options A and B) and the new proposed A&P rates (*i.e.*, Options D and E).

[5] FRD Charges for the optional 5-8pm D and E rates are reflected in Appendix B.

Table 4-4
Distribution Revenue Recovery Comparison

	TOU-PA-2 Current Option B	TOU-PA-2 Proposed Option D
% in Energy	0%	27%
% in TRD Charge	0%	10%
% in FRD	100%	63%
	TOU-PA-2 Current Option A	**TOU-PA-2 Proposed Option E**
% in Energy	0%	54%
% in TRD Charge	0%	0%
% in FRD	100%	46%
	TOU-PA-3 Current Option B	**TOU-PA-3 Proposed Option D**
% in Energy	0%	24%
% in TRD Charge	0%	9%
% in FRD	100%	67%
	TOU-PA-3 Current Option A	**TOU-PA-3 Proposed Option E**
% in Energy	0%	47%
% in TRD Charge	0%	0%
% in FRD	100%	53%

5) Voltage Discounts

A&P customers served at higher voltage delivery levels than the design voltage level for their rate class will receive a voltage discount reflecting their lower cost of service. SCE will establish the discount levels based on the difference in marginal costs of service between the design or predominant voltage level for a given rate class and the higher voltage service options. No modifications were proposed for the determination of the voltage discounts. Voltage discounts shall apply to the illustrative rate schedules, as indicated in Appendix B.

6) Power Factor Adjustments

No modifications were proposed for the determination of the power factor adjustment (PFA) rates, which are designed to recover the costs of additional capacitors installed by SCE to improve power factor. PFA rates shall apply to the illustrative rate schedules, as indicated in Appendix B.

C. Available Rate Options

1) Schedules PA-1 and PA-2

Schedules PA-1 and PA-2 are retained for customers located on Catalina Island. Because of the limited applicability of these schedules, proposed rate factors are set based on a functional SAPC adjustment using the updated revenue allocation for each class.

2) Schedule TOU-PA-2

SCE shall offer a menu of rate options to A&P customers within the TOU-PA-2 class, including the following:[6]

- Option D (base/default rate) using the standard TOU periods adopted in D.18-07-006;
- Option D-5to8 (optional rate) using the standard TOU periods adopted in D.18-07-006 but with a compressed 5-8pm peak period;[7]
- Option E (optional rate) using the standard TOU periods adopted in D.18-07-006;
- Option E-5to8 (optional rate) using the standard TOU periods adopted in D.18-07-006 but with a compressed 5-8pm peak period;
- Option CPP (optional rate), which incorporate the changes to the CPP rate adopted in D.18-07-006 as described below; and,
- GF-A and GF-B rates for eligible GF customers and existing SOP customers.

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6 Schedule TOU-PA-2 shall additionally continue to include a wind machine credit (*i.e.,* Special Condition 13 of Schedule TOU-PA-2). Customers are also eligible for RTP rate.

7 Appendix C includes the full description of the TOU periods for this alternate rate option.

a) **<u>Option D</u>**

The proposed Option D rates reflect a settled rate design structure that incorporates the following key elements using a Customer Charge, TOU Energy Charges, TRD Charges and an FRD Charge:

- Updated TOU periods as adopted in D.18-07-006;
- Customer Charges set at current levels to moderate bill impacts as customers transition to the new TOU periods, with the recovery of any customer marginal cost revenue deficiencies included in the FRD Charge;
- For distribution, TOU Energy Charges that recover approximately 50 percent of Peak-capacity costs for all TOU periods with smoothing and moderated TOU rate differentials to mitigate bill impacts as customers transition to the new TOU periods and experience time-differentiated distribution, a summer on-peak TRD Charge that recovers approximately 50 percent of summer Peak-capacity costs, and an FRD Charge that recovers Grid-related costs and 50 percent of the remaining Peak-related costs of the mid-, off-, and super-off-peak periods;
- For generation, TOU Energy Charges recover generation energy costs and a portion of generation capacity costs not recovered in the TRD Charge, with moderated TOU differentials in the winter to mitigate bill impacts as customers transition to the new TOU rates.

b) **<u>Option E</u>**

The proposed Option E rates reflect a settled rate design structure that incorporates the following key elements using a Customer Charge, TOU Energy Charges and an FRD Charge (no TRD Charges):

- Updated TOU periods as adopted in D.18-07-006;
- Customer Charges set at current levels to moderate bill impacts as customers transition to the new TOU periods, with the recovery of any customer marginal cost deficiencies included in the FRD Charge;
- For distribution, TOU Energy Charges that recover all Peak-capacity costs with smoothing and moderated TOU rate differentials to mitigate bill impacts as customers transition to new TOU periods and experience time-differentiated distribution charges, and an FRD Charge that recovers all Grid-related costs;
- For generation, recovery is via TOU Energy charges, with moderated TOU differentials in the winter to mitigate bill impacts as customers transition to the new TOU rates.

c) **<u>Option CPP</u>**

The proposed CPP rate option reflects the changes to the CPP program adopted in D.18-07-006, as follows, which shall take effect upon implementation of this Agreement:

- CPP event periods shall coincide with the updated TOU peak periods (*i.e.*, weekdays from 4-9 pm);
- The revised CPP event charge of \$0.80/kWh shall be phased in over two years – the event charge in the first year (2019) will be

$0.40/kWh and will increase to the full $0.80/kWh in the second year (2020);

- CPP-Lite and Capacity Reservation Level (CRL) options are eliminated; and,
- Bill protection will be offered to customers for up to one year.

d) Option RTP

A&P customers will remain eligible for the RTP rate option, with the illustrative rates reflected in Appendix B. No structural changes to the RTP program are proposed in this Agreement, though the changes to the RTP structure resulting from D.18-07-006 shall implement concurrently with the implementation of a final decision adopting this Agreement.

e) GF-A

The proposed GF-A rates reflect a settled rate design structure that adheres to the requirements of D.17-01-006. The design incorporates the following key modifications to SCE's original GF-A proposal:[8]

- Customer Charges are kept consistent with those adopted for the base rate;
- Time-differentiated distribution rates are incorporated using a settled set of PLRFs for the portion of distribution recovered via TOU Energy Charges; and,
- Modifications to how the 10 percent generation rate differential is applied in winter so that the 10 percent differential is based on generation energy only (not generation and capacity).

[8] In SCE's original proposal, SCE proposed to move the recovery of summer generation capacity revenue from TRD charges into time-differentiated Energy Charges and included a 10 percent differential for generation energy between the highest and lowest-priced TOU periods. SCE also proposed no time-differentiated distribution, with Design Demand Marginal Costs recovered entirely via the FRD Charge

f) GF-B

The proposed GF-B rates reflect a settled rate design structure that adheres to the requirements of D.17-01-006. The design incorporates the following modification to SCE's original GF-B proposal:[9]

- Customer Charges are kept consistent with those adopted for the base rate.

3) Schedule TOU-PA-3

SCE shall offer a menu of rate options to A&P customers within the TOU-PA-3 class, including the following:

- Option D (base rate) using the standard TOU periods adopted in D.18-07-006;
- Option D-5to8 (optional rate) using the standard TOU periods adopted in D.18-07-006 but with a compressed 5-8pm peak period;
- Option E (optional rate) using the standard TOU periods adopted in D.18-07-006;
- Option E-5to8 (optional rate) using the standard TOU periods adopted in D.18-07-006 but with a compressed 5-8pm peak period;
- Option CPP (default rate), which incorporate the changes to the CPP rate adopted in D.18-07-006 as described above;
- GF-A and GF-B rates for eligible GF customers and existing SOP customers.

The descriptions of the settled rate structure associated with the rate options outlined above are consistent with those described above for TOU-PA-2.

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[9] SCE's original proposal includes the following: Generation – Summer: the off-peak Energy Charge is set at 10 percent lower than the peak energy charge, 75 percent of the TRD revenue is recovered via the on-peak Demand Charge, and 25 percent of the TRD revenue is recovered via the mid-peak Demand Charge; Generation – Winter: the off-peak Energy Charge is set at 10 percent lower than the peak energy charge, and 100 percent of the TRD revenue is recovered via Energy Charges; Distribution: the customer charge is set at an EPMC-scaled RECC marginal cost and the Design Demand Marginal Distribution costs are recovered entirely via a non-coincident FRD Charge and not bifurcated between energy and demand charges (consistent with current treatment).

4) Schedule AP-I

SCE shall align Schedule AP-I with the underlying Base Rate attributes adopted in this proceeding, with the credits following the program budget schedule adopted in D.17-12-003. SCE will continue to provide AP-I credits based on the difference between the customer's average on- and mid-peak demand and firm service level. Illustrative AP-I credits are shown in Appendix B.

5) Elimination of the Existing SOP Rate Options (Schedules TOU-PA-2-SOP and TOU-PA-3-SOP)

The existing SOP rate options (*i.e.*, Schedules TOU-PA-2-SOP and TOU-PA-3-SOP) shall be eliminated; provided, however, that (i) Existing SOP Customers shall be allowed to take service on GF-A or GF-B until implementation of a final decision in SCE's 2021 GRC Phase 2; (ii) absent an alternative election, Existing SOP Customers will be defaulted to GF-A upon implementation of a final decision in this proceeding; and, (iii) all Existing SOP Customers shall be allowed to maintain their separate service connections, as currently allowed for in the existing SOP rate schedules. Specialized marketing, education and outreach (ME&O) specific to Existing SOP Customers is addressed below.

D. TOU Period Grandfathering

1) Eligibility

Consistent with the proposal in SCE's Application, A&P customers with BTM solar generation facilities who meet the requirements of D.17-01-006 and D.17-10-018 will be eligible for the relevant GF rates provided in this Agreement, as reflected in the illustrative rates in Appendix B. Additionally, Existing SOP Customers, as defined above, are also eligible for the GF rates provided in this Agreement.

2) <u>Duration</u>

Eligible solar customers may be served on GF rates for ten years from their individual PTO dates, but not to exceed July 31, 2027 (non-public agencies) or December 31, 2027 (public agencies), as established in D.17-01-006 and D.17-10-018. Existing SOP Customers are also eligible to receive service on the GF rates until the implementation of A&P rates adopted in SCE's 2021 GRC Phase 2. In the event that an Existing SOP Customer also meets the eligibility requirements of D.17-01-006 and D.17-10-018, the Existing SOP Customer is eligible to remain on a GF rate beyond the implementation of SCE's 2021 GRC Phase 2 for the duration specified in those decisions (*i.e.*, 10 years from PTO date).

3) <u>Available Options</u>

Consistent with the proposal in SCE's Application, eligible A&P customers may elect the following GF rate options:

- GF-A – intended for accounts in which the eligible non-standby solar system is located behind the same meter as the load; or
- GF-B – intended for standby accounts and for NEM-A, VNM and RES-BCT benefiting accounts.

Existing SOP Customers may elect either of these GF rate options.

4) <u>Rate Design</u>

The agreed-to GF rates are based on updated cost studies with TOU pricing signals based on Legacy TOU Periods. They represent the first step in a multi-step transition toward rates based on current marginal costs. Rate changes made in the attrition years (*i.e.*, before the implementation of SCE's 2021 GRC Phase 2 rates) will be made when SCE's revenue requirements or other revenue allocations change, utilizing SAPC adjustments. Upon implementation of SCE's 2021 GRC Phase 2 rates, the GF rate structures may be further revised as a transition to more cost-based rates.

E. Other TOU Period Mitigation

To help non-GF customers mitigate the impacts associated with the changing TOU periods, SCE shall offer the following:

- A menu of rate options that specifically includes an earlier end to the peak period (*i.e.*, 5-8pm) to help address safety and operational concerns;
- Personalized bill impacts and specialized outreach to customers with bill impacts exceeding five percent (based on a comparison of the illustrative rates included in Appendix B and the customers' current rate) beginning in September 2018;[10] and,
- Personalized bill impacts and specialized outreach to any Existing SOP Customer with a negative bill impact (based on a comparison of the illustrative rates included in Appendix B and the customers' current rate) and to any Existing SOP Customer that would benefit on one of the new rate options (based on a comparison of the illustrative rates included in Appendix B and the customers' current rate) beginning in September 2018. Bill impacts will be assessed based on the assumption that SOP customers are defaulted on to GF-A.

F. Enhanced ME&O

SCE shall develop an A&P-specific ME&O plan in connection with its implementation of the updated TOU periods and A&P rate design provided in this Agreement. SCE shall complete drafting the ME&O plan by the end of August 2018 for implementation beginning in September 2018, with Settling Parties having the opportunity to review and provide input on the plan prior to its finalization. The ME&O plan shall include a section on post-implementation communications. SCE shall also develop and provide an online rate analyzer tool for A&P customers with messaging indicating that customers can request additional information regarding

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[10] When determining if personalized outreach is necessary during this earlier timeframe, a minimum monthly threshold of $50 shall apply – meaning that if the customer's monthly bill impact is less than $50, SCE is not obligated to (nor precluded from) conducting the personalized outreach.

their available rate option,[11] including the option of having SCE perform manual load-shift analyses. In addition, SCE will provide manual rate analysis to A&P customers prior to the availability of the online rate analyzer tool as part of its ME&O plan to provide customers with actionable information regarding rate changes beginning six months before implementation of new TOU period definitions.

G. Tariff Rule 1 Modifications (Addition of New Definitions)

SCE's uncontested proposal to add definitions of "General Water Pumping" and "Sewerage Pumping" to SCE's Tariff Rule 1, Definitions, is adopted. To provide better clarity on customer eligibility for A&P rates, SCE's Tariff Rule 1 shall be modified to add the following definitions:

- General Water Pumping – a water supply pump or pumping system that supplies water and is not an on-the-farm pump or other system used for agricultural purposes.
- Sewerage Pumping – the use of pumps to pump fluids and/or solid waste through a sewer or water reclamation project.

H. Implementing Revenue Changes in Rates

As described in the Revenue Allocation Settlement Agreement,[12] when SCE's authorized revenues change in the future, SCE will first adjust rate levels for the Base Rate schedules (without CPP elements), using a Functional SAPC adjustment. SCE will then rebalance optional rate levels to ensure revenue neutrality between the Base Rate schedule and the optional rate schedules within each individual rate class (*i.e.*, TOU-PA-2, TOU-PA-3). For example, generation revenue changes resulting from SCE's ERRA proceedings shall be allocated on a Functional SAPC basis, *i.e.*, the revised SCE generation revenue requirement would be allocated by applying a generation-level SAPC scalar based on the difference between present rate revenues and proposed rate revenues for the Base Rate schedules. The optional rate schedules

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[11] The initial release of the rate analyzer tool in Q1 2019 may not include the optional 5-8pm rate options discussed herein since they weren't originally included in the scope of the project. These rate options will be added in a subsequent release, and messaging will be included in the tool that makes A&P customers aware that the 5-8pm rate options are available.

[12] *See* Paragraph 4.B.7 of the Revenue Allocation Settlement Agreement.

will then be adjusted to ensure revenue neutrality on a functional basis within each individual rate class.

5. **Implementation of Settlement Agreement**

It is the intent of the Settling Parties that SCE should be authorized to implement the rates resulting from this Settlement Agreement as soon as practicable following the issuance of a final Commission decision approving this Settlement Agreement, but no earlier than March 1, 2019.

6. **Incorporation of Complete Agreement**

This Agreement is to be treated as a complete package and not as a collection of separate agreements on discrete issues. To accommodate the interests related to diverse issues, the Settling Parties acknowledge that changes, concessions, or compromises by a Settling Party or Settling Parties in one section of this Agreement resulted in changes, concessions, or compromises by the Settling Parties in other sections. Consequently, the Settling Parties agree to oppose any modification of this Agreement not agreed to by all Settling Parties. If the Commission does not approve this Agreement without modification, the terms and conditions reflected in this Agreement shall no longer apply to the Settling Parties.

7. **Record Evidence**

The Settling Parties request that all of their related prepared testimony be admitted as part of the evidentiary record for this proceeding.

8. **Signature Date**

This Settlement Agreement shall become binding as of the last signature date of the Settling Parties.

9. **Regulatory Approval**

The Settling Parties, by signing this Agreement, acknowledge that they support Commission approval of this Agreement and subsequent implementation of all the provisions of the Agreement for the duration of rates implemented pursuant to a Commission order adopting this Agreement in this proceeding, *i.e.*, Phase 2 of SCE's 2018 GRC. The Settling Parties shall use their best efforts to obtain Commission approval of the Agreement. The Settling Parties shall jointly request that the Commission approve the Agreement without change, and find the Agreement to be reasonable, consistent with law and in the public interest.

Should any Proposed Decision or Alternate Proposed Decision seek a modification to this Settlement Agreement, and should any Settling Party be unwilling to accept such modification, that Settling Party shall so notify the other Settling Parties within five business days of issuance of such Proposed Decision or Alternate Proposed Decision. The Settling Parties shall thereafter promptly discuss the proposed modification and negotiate in good faith to achieve a resolution acceptable to the Settling Parties, and shall promptly seek Commission approval of the resolution so achieved. Failure to resolve such proposed modification to the satisfaction of the Settling Parties, or to obtain Commission approval of such resolution promptly thereafter, shall entitle any Settling Party to terminate its participation from this Agreement through prompt notice to the other Settling Parties.

10. <u>Compromise of Disputed Claims</u>

This Settlement Agreement represents a compromise of disputed claims between the Settling Parties. The Settling Parties have reached this Settlement Agreement after taking into account the possibility that each Party may or may not prevail on any given issue. The Settling Parties assert that this Settlement Agreement is reasonable, consistent with law and in the public interest.

11. <u>Non-Precedent</u>

Consistent with Rule 12.5 of the Commission's Rules of Practice and Procedure, this Settlement Agreement is not precedential in any other pending or future proceeding before this Commission, except as expressly provided in this Settlement Agreement or unless the Commission expressly provides otherwise.

12. <u>Previous Communications</u>

The Settlement Agreement contains the entire agreement and understanding between the Settling Parties as to the resolution of A&P rate design issues. In the event there is any conflict between the terms and scope of this Settlement Agreement and the terms and scope of the accompanying joint motion in support of the Settlement Agreement, the Settlement Agreement shall govern.

13. Non-Waiver

None of the provisions of this Settlement Agreement shall be considered waived by any Party unless such waiver is given in writing. The failure of a Party to insist in any one or more instances upon strict performance of any of the provisions of this Settlement Agreement or take advantage of any of their rights hereunder shall not be construed as a waiver of any such provisions or the relinquishment of any such rights for the future, but the same shall continue and remain in full force and effect.

14. Effect of Subject Headings

Subject headings in this Settlement Agreement are inserted for convenience only, and shall not be construed as interpretations of the text.

15. Governing Law

This Settlement Agreement shall be interpreted, governed and construed under the laws of the State of California, including Commission decisions, orders and rulings, as if executed and to be performed wholly within the State of California.

16. Number of Originals

This Settlement Agreement is executed in counterparts, each of which shall be deemed an original. The undersigned represent that they are authorized to sign on behalf of the Party represented.

Dated: August 3, 2018 SOUTHERN CALIFORNIA EDISON COMPANY

/s/ Ronald O. Nichols

By: Ronald O. Nichols
Title: President

Dated: August 3, 2018 AGRICULTURAL ENERGY CONSUMERS ASSOCIATION

/s/ Michael Boccadoro

By: Michael Boccadoro
Title: Executive Director

Dated: August 3, 2018 CALIFORNIA FARM BUREAU FEDERATION

/s/ Karen Norene Mills

By: Karen Norene Mills
Title: Associate Counsel

Appendix A

Comparison of Parties' Positions on Agricultural and Pumping Rate Design Issues

Comparison of Parties' Positions
Agricultural & Pumping Rate Groups

Issue	Current Treatment (*i.e.*, 2015 GRC Settled Position)	SCE	CFBF	AECA	2018 GRC Settled Position
TOU-PA-2, Option D (Base Rate) Rate Design	• Offer Option B as the base rate; includes Customer Charge, TOU Energy Charges, TRD Charge and FRD Charge	• Propose to offer Option D as the replacement for Option B • Customer Charge: ~\$55/mo, adjusted to recover a portion (first 50 kVA) of the FLT costs in the grid distribution demand charge • Generation Energy: recovered via TOU Energy Charges • Generation Capacity: recovered via a combination of TOU Energy Charges and TRD Charges • Distribution Peak: recovered via a combination of TOU cent-per-kWh Energy Charges, TRD Charge and FRD Charge • Distribution Grid: recovered via an FRD Charge	• Proposes alternate rate design for Option D to mitigate bill impacts that: ○ Uses updated TOU periods ○ Maintains SCE's proposal for the summer TOU Energy Charges and TRD Charges ○ Moderates the winter TOU Energy Charge differentials proposed by SCE ○ Maintains the existing Customer Charge (shifts revenue to FRD Charge)	• Maintain customer charge at current level • Offer a range of tariff options that (1) rely on time-dependent demand charges for higher load factor customers, (2) depend largely on energy charges for those w/ intermittent or variable usage, and (3) reward shifting loads to off-peak periods by maintaining substantial peak/off-peak price differentials	• Offer a modified Option D based on settled rate design that incorporates: ○ Updated TOU periods ○ Customer charges set at current levels (deficiencies to be recovered into FRD Charge) ○ For distribution, TOU Energy Charges recover 50% of Peak capacity costs w/ smoothing and moderated TOU rate differentials to mitigate bill impacts, summer on-peak TRD Charge recovers 50% summer Peak-capacity cost, and FRD Charge recovers Grid-related costs and 50% of remaining Peak-related costs of the mid-peak, off-peak and SOP periods ○ For generation, use SCE's proposal with moderated TOU period differentials for winter energy rates to mitigate bill impacts
TOU-PA-2, Option E (Optional Rate) Rate Design	• Offer Option A as an optional rate that includes a Customer Charge, TOU Energy Charges and an	• Propose to offer Option E as the replacement for Option A (maintain no TRD structure)	• Proposes alternate rate design for Option E to mitigate bill impacts that:	• Maintain customer charge at current level • Offer a range of tariff options that (1) rely on time-dependent	• Offer a modified Option E based on settled rate design that incorporates:

Issue	Current Treatment (*i.e.*, 2015 GRC Settled Position)	SCE	CFBF	AECA	2018 GRC Settled Position
	FRD Charge (but no TRD Charges)	• Customer Charge: ~$55/mo, adjusted to recover a portion (first 50 kVA) of the FLT costs in the grid distribution demand charge • Generation Energy: recovered via TOU Energy Charges • Generation Capacity: recovered entirely via TOU cent-per-kWh Energy Charges • Distribution Peak: recovered entirely via cent-per-kWh Energy Charge • Distribution Grid: recovered via an FRD Charge	o Uses updated TOU periods o Maintains SCE's proposal for summer TOU Energy Charges o Moderates the winter TOU Energy Charge differentials o Maintains the existing Customer Charge (shifts revenue to FRD Charge)	demand charges for higher load factor customers, (2) depend largely on energy charges for those w/ intermittent or variable usage, and (3) reward shifting loads to off-peak periods by maintaining substantial peak/off-peak price differentials	o Updated TOU periods o Customer charges set at current levels (deficiencies to be recovered into FRD Charge) o For distribution, TOU Energy Charges recover all Peak-capacity costs with smoothing and TOU rate differential moderation to mitigate bill impacts, an FRD Charge recovers all Grid-related costs, and no distribution TRD o For generation, use SCE's proposal with moderated TOU rate differentials for winter energy rates to mitigate bill impacts
TOU-PA-3, Option D (Base Rate) Rate Design	• Offer Option B as the base rate; includes Customer Charge, TOU Energy Charges, TRD Charge and FRD Charge	• Propose to offer Option D as the replacement for Option B • Customer Charge: ~$305/mo, adjusted to recover a portion (first 50 kVA) of the FLT costs in the grid distribution demand charge • Generation Energy: recovered via TOU Energy Charges • Generation Capacity: recovered via a combination of TOU Energy Charges and TRD Charges	• Expresses concern about bill impacts and notes that the bill increases are due in part to the large revenue allocation increase proposed for this rate class; other mitigation measures may be necessary such as alternate or optional tariff options, bill impact limiters, or other options to limit increases to no more than 5%	• Maintain customer charge at current level • Offer a range of tariff options that (1) rely on time-dependent demand charges for higher load factor customers, (2) depend largely on energy charges for those w/ intermittent or variable usage, and (3) reward shifting loads to off-peak periods by maintaining substantial peak/off-peak price differentials	Same as TOU-PA-2, Option D

Issue	Current Treatment (*i.e.*, 2015 GRC Settled Position)	SCE	CFBF	AECA	2018 GRC Settled Position
		• Distribution Peak: recovered via a combination of TOU cent-per-kWh Energy Charges, TRD Charge and FRD Charge • Distribution Grid: recovered via an FRD Charge			
TOU-PA-3, Option E (Optional Rate) Rate Design	• Offer Option A as an optional rate that includes a Customer Charge, TOU Energy Charges and an FRD Charge (but no TRD Charges)	• Propose to offer Option E as the replacement for Option A (maintain no TRD structure) • Customer Charge: ~$305/mo, adjusted to recover a portion (first 50 kVA) of the FLT costs in the grid distribution demand charge • Generation Energy: recovered via TOU Energy Charges • Generation Capacity: recovered entirely via TOU cent-per-kWh Energy Charges • Distribution Peak: recovered entirely via cent-per-kWh Energy Charge • Distribution Grid: recovered via an FRD Charge	• Same as Option D above	• Maintain customer charge at current level • Offer a range of tariff options that (1) rely on time-dependent demand charges for higher load factor customers, (2) depend largely on energy charges for those w/ intermittent or variable usage, and (3) reward shifting loads to off-peak periods by maintaining substantial peak/off-peak price differentials	Same as TOU-PA-2, Option E
Solar Grandfathering (GF) Rates	N/A	• Eligibility limited to customers with BTM solar generating facilities who meet the eligibility requirements of D.17-01-006 and D.17-10-018 • Eligible customers may be served on the GF rates from their	• Agrees that rates using legacy TOU periods are needed for solar customers who are eligible under D.17-01-006 and that the rates must include factors in addition to marginal cost (*i.e.*, maintain directional consistency of legacy TOU periods)	Did not address	• Adopt SCE's proposals for solar grandfathering eligibility, duration and options • For rate design, utilize SCE's proposed updated cost studies and revenue allocation to set GF rates based on SCE's proposed GF rate design with the

Issue	Current Treatment (*i.e.*, 2015 GRC Settled Position)	SCE	CFBF	AECA	2018 GRC Settled Position
		individual PTO dates, but not to exceed July 31, 2027 (non-public agencies) or December 31, 2027 (public agencies) as established in D.17-01-006 and D.17-10-018 • Offer GF-A and GF-B rate options for TOU-PA-2 and TOU-PA-3 ○ GF-A: intended for accounts where the eligible non-standby solar system is located behind the same meter as the load; move the recovery of summer generation capacity revenues from TRD charges into time-differentiated energy charges and include a 10% differential for generation energy between the highest and lowest-priced TOU periods; no time-differentiated distribution – design demand marginal distribution costs are recovered entirely via an FRD Charge ○ GF-B: intended for standby accounts and for NEM-A/ VNM/ RES-BCT benefiting accounts; generation energy rates were adjusted	• Customer charges adopted for the default A&P rate schedules should also be applied to the solar GF rates		following modifications: ○ Keep customer charge consistent w/ base rates, and, ○ Incorporate time-differentiated distribution using a compromise set of PLRFs for the portion of distribution recovered via Energy Charges for GF-A ○ Modify how the 10% generation rate differential is applied in winter for GF-A to be on gen energy only (not gen energy + capacity) • Utilize SAPC adjustments when SCE's revenue requirements or other revenue allocations change until implementation of the next GRC Phase 2, at which time the GF rate structures may be further revised as transitory rates

Issue	Current Treatment (*i.e.*, 2015 GRC Settled Position)	SCE	CFBF	AECA	2018 GRC Settled Position
		to provide a 10% differential between the highest- and lowest-priced TOU periods in each season and generation TRD Charges were set based on the seasonal allocation of revenue and the associated billing determinants; distribution design is the same as for GF-A ○ Propose to update rates periodically, consistent w/ all other rates, when SCE's revenue requirement or revenue allocations change			
Existing SOP Rates (TOU-PA-2-SOP and TOU-PA-3-SOP)	• Offer SOP rates that include a midnight-6am SOP period and 1pm-5pm on-peak period with alternate seasonal definitions • Increased generation energy price differential between the highest and lowest cost periods to encourage usage in lower-cost periods • Allow SOP service to have an additional separate meter and service connection	• Eliminate these SOP rate options as the TOU periods do not align with the new winter SOP period proposed (and adopted) in the 2016 RDW, which provides an SOP period for all customers • Explore potential new rate options for existing SOP customers during proceeding	• Allow existing SOP customers to take service on the solar GF rates and/or apply the additional TOU period mitigation measures outlined below	• Keep existing SOP rates open • Propose calculation for SOP incentive and on-peak demand charge adder	• Adopt SCE's proposal to eliminate the existing SOP rate options (*i.e.*, TOU-PA-2-SOP & TOU-PA-3-SOP) • Allow Existing SOP Customers to take service on the solar GF rates (*i.e.*, GF-A and GF-B) until the implementation of a final decision in SCE's 2021 GRC Phase 2 • Absent an alternative election, Existing SOP Customers will be defaulted to GF-A upon implementation of a final decision in this proceeding • All Existing SOP Customers to maintain

Issue	Current Treatment (*i.e.*, 2015 GRC Settled Position)	SCE	CFBF	AECA	2018 GRC Settled Position
					their separate service connections
Critical Peak Pricing (CPP)	• Implement default CPP concurrently with the implementation of the updated TOU periods adopted in the 2016 RDW	Implement proposals made in 2016 RDW: • Option CPP shall become the default rate option for TOU-PA-3 • CPP event periods will coincide with the updated peak periods (*i.e.*, weekdays from 4-9 p.m.) • Revised CPP Event Charge of $0.80/kWh will be phased-in over two years – the event charge in the first year (2019) will be $0.40/kWh and will increase to the full $0.80/kWh in the second year (2020) • CPP-Lite option will no longer be available • Bill protection will be offered to customers for up to one year	Did not address	Did not address	• Adopt SCE's uncontested proposal as approved in D.18-07-006
Schedule AP-I	• Offer AP-I program with the credits at 90% of the average value derived by averaging the AP-I program credits with the 2015 MC&RA Settlement Agreement with the existing values adopted in D.13-03-031	• Align AP-I with the underlying base rate attributes adopted in this proceeding, with the credits following the program budget schedule adopted in D.17-12-003	Did not address	Did not address	• Adopt SCE's proposal, whereby SCE will continue to provide AP-I credits based on the difference between the customer's average on- and mid-peak demand and firm service level; credits to follow the program budget schedule adopted in D.17-12-003
TOU Period Mitigation Measures (for non-solar GF customers)	N/A	• Did not propose any TOU period mitigation measures for non-solar GF customers	• Possible mitigation measures could include the following: ○ Optional rate w/ 5-8pm peak and	• Grandfather customers w/ inverted load profiles for 10 years on legacy TOU periods w/ legacy peak differentials	• SCE to offer optional Option D and E rates w/ 5-8pm peak period to help address safety / operational concerns and offer a menu of

Issue	Current Treatment (*i.e.*, 2015 GRC Settled Position)	SCE	CFBF	AECA	2018 GRC Settled Position
			moderated TOU differentials ○ Allow customers who have made investments to be eligible for solar GF rates ○ 5% rate impact bill limiter as a backstop ○ Delay mandatory implementation of updated TOU periods		rate options to customers • See additionally ME&O and SOP settled positions
ME&O	N/A	• Did not propose any additional ME&O activities beyond those proposed (and adopted) in the 2o16 RDW	• Minimum of 6 months of ME&O / rate analysis tools are needed before mandatory implementation of the new rates (if <6 months, new rates should be opt-in only) and mandatory implementation should take place during January through March to avoid heavy harvest and irrigation seasons • SCE fails to provide an ME&O plan specific to A&P like they did for small commercial customers • Request the following ME&O activities: ○ Tailored mass media campaign ○ Rate analysis tools that allow customers to input data and see the impacts of shifting load ○ Personalized notification of bill impacts at least three months in advance of new rates	Did not address	• SCE to provide an Ag&Pump-specific ME&O plan the beginning of August 2018 for review and finalization by the end of August 2018 ○ Will include post-implementation communications • SCE to provide personalized bill impacts and specialized outreach to customers with bill impacts >5% (based on any individual service account) and all impacted SOP customers beginning in September 2018 • SCE to provide online rate analyzer tool for all other customers with messaging around how they can request more information (including the option of having SCE perform "manual" load-shift analyses)

Issue	Current Treatment (*i.e.*, 2015 GRC Settled Position)	SCE	CFBF	AECA	2018 GRC Settled Position
			○ Specialized outreach to most impacted customers (including all SOP) ○ Post-implementation communications		
Add Tariff Rule 1 Definitions for General Water Pumping and Sewerage Pumping	N/A	• Add definitions for "General Water Pumping" and "Sewerage Pumping" to Tariff Rule 1, Definitions, to provide clarity regarding how these terms apply in Form 14-946, *Affidavit Regarding Eligibility for General Water or Sewerage Pumping*	Did not address	Did not address	• Adopt SCE's uncontested proposal to add definitions for the terms "General Water Pumping" and "Sewerage Pumping" to Tariff Rule 1
Other	N/A	N/A	• Use 2017 load shapes for rate designs and mitigation measures since 2015 was a drought year	• Implement daily demand charges if SCE want to continue to use demand charges	• SCE used 2017 billing determinants for settlement bill impact analyses • Did not utilize daily demand charges in settled rate design (SCE billing system unable to implement prior to completion of CSRP billing system update); Option E proposals move in the direction of daily demand charges

Appendix B

Illustrative Agricultural and Pumping Rate Group Rates

	January 2018 Rates			Proposed 2018 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
Schedule-S-D (Less than 500 kW)									
Energy Charge - $/kWh/Meter/Month - see (OAT)									
Customer Charge - $/Meter/Month - see (OAT)									
Standby (CRC) - $kW									
TOU-PA-2 (Rate D4)	8.69	0.00	8.69	8.90	0.00	8.90	2.4%		2.4%
Voltage Discount, Capacity Reservation Demand - $/kW									
From 2 kV to 50 kV	(0.08)	0.00	(0.08)	(0.08)	0.00	(0.08)	0.0%		0.0%
51 kV to 219 kV	(2.76)	0.00	(2.76)	(2.71)	0.00	(2.71)	1.8%		1.8%
220 kV and Above	(6.32)	0.00	(6.32)	(6.69)	0.00	(6.69)	-5.9%		-5.9%
TOU-PA-2 (Rate E4)				7.59	0.00	7.59			
Voltage Discount, Capacity Reservation Demand - $/kW									
From 2 kV to 50 kV				(0.06)	0.00	(0.06)			
51 kV to 219 kV				(2.18)	0.00	(2.18)			
220 kV and Above				(5.38)	0.00	(5.38)			
TOU-PA-2 (Rate D5)				9.27	0.00	9.27			
Voltage Discount, Capacity Reservation Demand - $/kW									
From 2 kV to 50 kV				(0.08)	0.00	(0.08)			
51 kV to 219 kV				(2.86)	0.00	(2.86)			
220 kV and Above				(7.06)	0.00	(7.06)			
TOU-PA-2 (Rate E5)				7.59	0.00	7.59			
Voltage Discount, Capacity Reservation Demand - $/kW									
From 2 kV to 50 kV				(0.06)	0.00	(0.06)			
51 kV to 219 kV				(2.18)	0.00	(2.18)			
220 kV and Above				(5.38)	0.00	(5.38)			
TOU-PA-3 (Rate D4)	9.11	0.00	9.11	9.18	0.00	9.18	0.8%		0.8%
Voltage Discount, Capacity Reservation Demand - $/kW									
From 2 kV to 50 kV	(0.11)	0.00	(0.11)	(0.09)	0.00	(0.09)	18.2%		18.2%
51 kV to 219 kV	(3.49)	0.00	(3.49)	(3.40)	0.00	(3.40)	2.6%		2.6%
220 kV and Above	(6.32)	0.00	(6.32)	(6.57)	0.00	(6.57)	-4.0%		-4.0%
TOU-PA-3 (Rate E4)				7.84	0.00	7.84			
Voltage Discount, Capacity Reservation Demand - $/kW									
From 2 kV to 50 kV				(0.07)	0.00	(0.07)			
51 kV to 219 kV				(2.71)	0.00	(2.71)			
220 kV and Above				(5.23)	0.00	(5.23)			
TOU-PA-3 (Rate D5)				9.53	0.00	9.53			
Voltage Discount, Capacity Reservation Demand - $/kW									
From 2 kV to 50 kV				(0.09)	0.00	(0.09)			
51 kV to 219 kV				(3.58)	0.00	(3.58)			
220 kV and Above				(6.92)	0.00	(6.92)			
TOU-PA-3 (Rate E5)				7.84	0.00	7.84			
Voltage Discount, Capacity Reservation Demand - $/kW									
From 2 kV to 50 kV				(0.07)	0.00	(0.07)			
51 kV to 219 kV				(2.71)	0.00	(2.71)			
220 kV and Above				(5.23)	0.00	(5.23)			
PA-1	8.69	0.00	8.69	8.90	0.00	8.90	2.4%		2.4%
Voltage Discount, Capacity Reservation Demand - $/kW									
From 2 kV to 50 kV	(0.08)	0.00	(0.08)	(0.08)	0.00	(0.08)	0.0%		0.0%
51 kV to 219 kV	(2.76)	0.00	(2.76)	(2.71)	0.00	(2.71)	1.8%		1.8%
220 kV and Above	(6.32)	0.00	(6.32)	(6.69)	0.00	(6.69)	-5.9%		-5.9%
PA-2	8.69	0.00	8.69	8.90	0.00	8.90	2.4%		2.4%
Voltage Discount, Capacity Reservation Demand - $/kW									
From 2 kV to 50 kV	(0.08)	0.00	(0.08)	(0.08)	0.00	(0.08)	0.0%		0.0%
51 kV to 219 kV	(2.76)	0.00	(2.76)	(2.71)	0.00	(2.71)	1.8%		1.8%
220 kV and Above	(6.32)	0.00	(6.32)	(6.69)	0.00	(6.69)	-5.9%		-5.9%
Facilities Related Demand Charge - see OAT									
Demand Charge - $kW applicable to metered maximum kW demand in excess Standby									
Generation Time-related demand charge - see OAT									
Power Factor Adjustment Charge - see OAT									

	January 2018 Rates			Proposed 2018 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
Schedule-S (Less than 500 kW) - GF									
Energy Charge - $/kWh/Meter/Month - see (OAT)									
Customer Charge - $/Meter/Month - see (OAT)									
Standby (CRC) - $kW									
TOU-PA-2 (Rate B)				11.99	0.00	11.99			
Voltage Discount, Capacity Reservation Demand - $/kW									
From 2 kV to 50 kV				(0.13)	0.00	(0.13)			
51 kV to 219 kV				(3.99)	0.00	(3.99)			
220 kV and Above				(9.78)	0.00	(9.78)			
TOU-PA-2 (Rate A)				7.59	0.00	7.59			
Voltage Discount, Capacity Reservation Demand - $/kW									
From 2 kV to 50 kV				(0.07)	0.00	(0.07)			
51 kV to 219 kV				(2.19)	0.00	(2.19)			
220 kV and Above				(5.38)	0.00	(5.38)			
TOU-PA-3 (Rate B)				12.27	0.00	12.27			
Voltage Discount, Capacity Reservation Demand - $/kW									
From 2 kV to 50 kV				(0.14)	0.00	(0.14)			
51 kV to 219 kV				(4.67)	0.00	(4.67)			
220 kV and Above				(9.66)	0.00	(9.66)			
TOU-PA-3 (Rate A)				7.84	0.00	7.84			
Voltage Discount, Capacity Reservation Demand - $/kW									
From 2 kV to 50 kV				(0.07)	0.00	(0.07)			
51 kV to 219 kV				(2.53)	0.00	(2.53)			
220 kV and Above				(5.23)	0.00	(5.23)			
Facilities Related Demand Charge - see OAT									
Demand Charge - $kW applicable to metered maximum kW demand in excess Standby									
Generation Time-related demand charge - see OAT									
Power Factor Adjustment Charge - see OAT									
TOU-PA-2-RTP									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.01888	Variable*	Variable*	0.04842	Variable*	Variable*	156.5%		
Mid-peak				0.04842	Variable*	Variable*			
Off-Peak				0.02443	Variable*	Variable*			
Winter Season									
Mid-peak				0.03126	Variable*	Variable*			
Off-Peak				0.02883	Variable*	Variable*			
Super-Off-Peak				0.02745	Variable*	Variable*			
Customer Charge - $/month	43.15	0.00	43.15	43.15	0.00	43.15	0.0%		0.0%
Facilities Related									
Demand Charge - $/kW	11.47	0.00	11.47	8.90	0.00	8.90	-22.4%		-22.4%
Time Related Demand Charge - $/kW									
Summer Season									
On-Peak				2.55	0.00	2.55			
Mid-Peak				0.00	0.00	0.00			
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.12)	0.00	(0.12)	(0.08)	0.00	(0.08)	33.3%		33.3%
From 51 kV to 219 kV	(3.97)	0.00	(3.97)	(2.71)	0.00	(2.71)	31.7%		31.7%
220 kV and above	(9.10)	0.00	(9.10)	(6.69)	0.00	(6.69)	26.5%		26.5%
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV				(0.04)	0.00	(0.04)			
From 51 kV to 219 kV				(1.05)	0.00	(1.05)			
220 kV and above				(2.55)	0.00	(2.55)			
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	0.00000	(0.00205)	(0.00205)	(0.00014)	(0.00114)	(0.00128)		44.4%	37.6%
From 51 kV to 219 kV	0.00000	(0.00491)	(0.00491)	(0.00397)	(0.00270)	(0.00667)		45.0%	-35.8%
220 kV and above	0.00000	(0.00496)	(0.00496)	(0.00964)	(0.00272)	(0.01236)		45.2%	-149.2%
California Climate Credit - $/kWh/Meter/Month	(0.00400)	0.00000	(0.00400)	(0.00412)	0.00000	(0.00412)	-3.0%		-3.0%

	January 2018 Rates			Proposed 2018 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
PA-1									
Energy Charge - $/kWh	0.04455	0.09544	0.13999	0.04673	0.06463	0.11136	4.9%	-32.3%	-20.5%
Customer Charge - $/month	61.23	0.00	61.23	43.15	0.00	43.15	-29.5%		-29.5%
Service Charge - $/hp	4.30	0.00	4.30	4.32	0.00	4.32	0.5%		0.5%
Wind Machine Credit- $/hp	0.00	(4.10)	(4.10)	0.00	(4.12)	(4.12)		-0.5%	-0.5%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	0.00000	(0.00207)	(0.00207)	(0.00054)	(0.00116)	(0.00170)		44.0%	17.9%
From 51 kV to 219 kV	0.00000	(0.00469)	(0.00469)	(0.02093)	(0.00256)	(0.02349)		45.4%	-400.9%
220 kV and above	0.00000	(0.00474)	(0.00474)	(0.02737)	(0.00259)	(0.02996)		45.4%	-532.1%
Voltage Discount, Connected Load - $/Hp									
From 2 kV to 50 kV	(0.03)	0.00	(0.03)	(0.03)	0.00	(0.03)	0.0%		0.0%
From 51 kV to 219 kV	(1.08)	0.00	(1.08)	(1.14)	0.00	(1.14)	-5.6%		-5.6%
220 kV and above	(1.09)	0.00	(1.09)	(1.15)	0.00	(1.15)	-5.5%		-5.5%
PA-2									
Energy Charge - $/kWh									
Summer	0.01882	0.09715	0.11597	0.03745	0.07206	0.10951	99.0%	-25.8%	-5.6%
Winter	0.01882	0.05403	0.07285	0.02883	0.04967	0.07850	53.2%	-8.1%	7.8%
Customer Charge - $/month	120.18	0.00	120.18	43.15	0.00	43.15	-64.1%		-64.1%
Facilities Related									
Demand Charge - $/kW	11.65	0.00	11.65	8.90	0.00	8.90	-23.6%		-23.6%
Time Related Demand Charge - $/kW									
Summer Season	0.00	3.31	3.31	0.00	2.87	2.87		-13.3%	-13.3%
Winter Season	0.00	0.00	0.00	0.00	0.00	0.00			
TOU Rate Meter Charge - $/month									
TOU-RTEM	129.89	0.00	129.89	0.00	0.00	0.00	-100.0%		-100.0%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.10)	0.00	(0.10)	(0.08)	0.00	(0.08)	20.0%		20.0%
From 51 kV to 219 kV	(3.41)	0.00	(3.41)	(2.71)	0.00	(2.71)	20.5%		20.5%
220 kV and above	(7.06)	0.00	(7.06)	(6.69)	0.00	(6.69)	5.2%		5.2%
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV	0.00	(0.33)	(0.33)	0.00	(0.05)	(0.05)		84.8%	84.8%
From 51 kV to 219 kV	0.00	(0.95)	(0.95)	0.00	(0.14)	(0.14)		85.3%	85.3%
220 kV and above	0.00	(0.96)	(0.96)	0.00	(0.14)	(0.14)		85.4%	85.4%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	0.00000	(0.00138)	(0.00138)	(0.00020)	(0.00108)	(0.00128)		21.7%	7.2%
From 51 kV to 219 kV	0.00000	(0.00312)	(0.00312)	(0.00551)	(0.00238)	(0.00789)		23.7%	-152.9%
220 kV and above	0.00000	(0.00315)	(0.00315)	(0.01339)	(0.00240)	(0.01579)		23.8%	-401.3%
TOU-PA-2-E									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.01888	0.33646	0.35534	0.06651	0.28556	0.35207	252.3%	-15.1%	-0.9%
Mid-peak	0.01888	0.08563	0.10451	0.06651	0.06337	0.12988	252.3%	-26.0%	24.3%
Off-Peak	0.01888	0.03719	0.05607	0.03077	0.04213	0.07290	63.0%	13.3%	30.0%
Winter Season									
Mid-peak	0.01888	0.05377	0.07265	0.04267	0.06221	0.10488	126.0%	15.7%	44.4%
Off-Peak	0.01888	0.04279	0.06167	0.03791	0.04951	0.08742	100.8%	15.7%	41.8%
Super-Off-Peak				0.03520	0.04227	0.07747			
Customer Charge - $/month	43.15	0.00	43.15	43.15	0.00	43.15	0.0%		0.0%
Facilities Related									
Demand Charge - $/kW	11.47	0.00	11.47	7.59	0.00	7.59	-33.8%		-33.8%
Wind Machine Credit- $/kW	0.00	(8.30)	(8.30)	0.00	(6.68)	(6.68)		19.5%	19.5%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	0.00000	(0.00205)	(0.00205)	(0.00026)	(0.00114)	(0.00140)		44.4%	31.7%
From 51 kV to 219 kV	0.00000	(0.00491)	(0.00491)	(0.00759)	(0.00270)	(0.01029)		45.0%	-109.6%
220 kV and above	0.00000	(0.00496)	(0.00496)	(0.01853)	(0.00272)	(0.02125)		45.2%	-328.4%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.12)	0.00	(0.12)	(0.06)	0.00	(0.06)	50.0%		50.0%
From 51 kV to 219 kV	(3.97)	0.00	(3.97)	(2.18)	0.00	(2.18)	45.1%		45.1%
220 kV and above	(9.10)	0.00	(9.10)	(5.38)	0.00	(5.38)	40.9%		40.9%
California Climate Credit - $/kWh/Meter/Month	(0.00400)	0.00000	(0.00400)	(0.00412)	0.00000	(0.00412)	-3.0%		-3.0%

	January 2018 Rates			Proposed 2018 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
TOU-PA-2-D									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.01888	0.12076	0.13964	0.04842	0.07047	0.11889	156.5%	-41.6%	-14.9%
Mid-peak	0.01888	0.05984	0.07872	0.04842	0.06337	0.11179	156.5%	5.9%	42.0%
Off-Peak	0.01888	0.03719	0.05607	0.02443	0.04213	0.06656	29.4%	13.3%	18.7%
Winter Season									
Mid-peak	0.01888	0.05377	0.07265	0.03126	0.05323	0.08449	65.6%	-1.0%	16.3%
Off-Peak	0.01888	0.04279	0.06167	0.02883	0.04236	0.07119	52.7%	-1.0%	15.4%
Super-Off-Peak				0.02745	0.03618	0.06363			
Customer Charge - $/month	43.15	0.00	43.15	43.15	0.00	43.15	0.0%		0.0%
Facilities Related									
Demand Charge - $/kW	11.47	0.00	11.47	8.90	0.00	8.90	-22.4%		-22.4%
Time Related Demand Charge - $/kW									
Summer Season									
On-Peak	0.00	12.24	12.24	2.55	10.60	13.15		-13.4%	7.4%
Mid-Peak	0.00	2.21	2.21	0.00	0.00	0.00		-100.0%	-100.0%
Winter Season									
Mid-Peak				0.00	1.86	1.86			
Wind Machine Credit- $/kW	0.00	(8.30)	(8.30)	0.00	(6.68)	(6.68)		19.5%	19.5%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.12)	0.00	(0.12)	(0.08)	0.00	(0.08)	33.3%		33.3%
From 51 kV to 219 kV	(3.97)	0.00	(3.97)	(2.71)	0.00	(2.71)	31.7%		31.7%
220 kV and above	(9.10)	0.00	(9.10)	(6.69)	0.00	(6.69)	26.5%		26.5%
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV	0.00	(0.25)	(0.25)	(0.04)	(0.10)	(0.14)		60.0%	44.0%
From 51 kV to 219 kV	0.00	(0.69)	(0.69)	(1.05)	(0.27)	(1.32)		60.9%	-91.3%
220 kV and above	0.00	(0.70)	(0.70)	(2.55)	(0.27)	(2.82)		61.4%	-302.9%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	0.00000	(0.00136)	(0.00136)	(0.00014)	(0.00080)	(0.00094)		41.2%	30.9%
From 51 kV to 219 kV	0.00000	(0.00300)	(0.00300)	(0.00397)	(0.00177)	(0.00574)		41.0%	-91.3%
220 kV and above	0.00000	(0.00303)	(0.00303)	(0.00964)	(0.00179)	(0.01143)		40.9%	-277.2%
California Climate Credit - $/kWh/Meter/Month	(0.00400)	0.00000	(0.00400)	(0.00412)	0.00000	(0.00412)	-3.0%		-3.0%
TOU-PA-2-E5to8									
Energy Charge - $/kWh									
Summer Season									
On-Peak				0.09620	0.46529	0.56149			
Mid-peak				0.09620	0.10305	0.19925			
Off-Peak				0.03285	0.04213	0.07498			
Winter Season									
Mid-peak				0.04092	0.06229	0.10321			
Off-Peak				0.03652	0.04957	0.08609			
Super-Off-Peak				0.03401	0.04233	0.07634			
Customer Charge - $/month				43.15	0.00	43.15			
Facilities Related									
Demand Charge - $/kW				7.59	0.00	7.59			
Wind Machine Credit- $/kW				0.00	(6.68)	(6.68)			
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV				(0.00026)	(0.00114)	(0.00140)			
From 51 kV to 219 kV				(0.00759)	(0.00270)	(0.01029)			
220 kV and above				(0.01853)	(0.00272)	(0.02125)			
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV				(0.06)	0.00	(0.06)			
From 51 kV to 219 kV				(2.18)	0.00	(2.18)			
220 kV and above				(5.38)	0.00	(5.38)			
California Climate Credit - $/kWh/Meter/Month				(0.00412)	0.00000	(0.00412)			

	January 2018 Rates			Proposed 2018 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
TOU-PA-2-D5to8									
Energy Charge - $/kWh									
Summer Season									
On-Peak				0.05778	0.11546	0.17324			
Mid-peak				0.05778	0.10305	0.16083			
Off-Peak				0.02610	0.04213	0.06823			
Winter Season									
Mid-peak				0.03014	0.05319	0.08333			
Off-Peak				0.02794	0.04232	0.07026			
Super-Off-Peak				0.02669	0.03614	0.06283			
Customer Charge - $/month				43.15	0.00	43.15			
Facilities Related									
Demand Charge - $/kW				9.27	0.00	9.27			
Time Related Demand Charge - $/kW									
Summer Season									
On-Peak				1.73	10.70	12.43			
Mid-Peak				0.00	0.00	0.00			
Winter Season									
Mid-Peak				0.00	1.94	1.94			
Wind Machine Credit- $/kW				0.00	(6.68)	(6.68)			
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV				(0.08)	0.00	(0.08)			
From 51 kV to 219 kV				(2.86)	0.00	(2.86)			
220 kV and above				(7.06)	0.00	(7.06)			
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV				(0.03)	(0.10)	(0.13)			
From 51 kV to 219 kV				(0.71)	(0.27)	(0.98)			
220 kV and above				(1.73)	(0.27)	(2.00)			
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV				(0.00014)	(0.00080)	(0.00094)			
From 51 kV to 219 kV				(0.00379)	(0.00176)	(0.00555)			
220 kV and above				(0.00918)	(0.00178)	(0.01096)			
California Climate Credit - $/kWh/Meter/Month				(0.00412)	0.00000	(0.00412)			

	January 2018 Rates			Proposed 2018 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
TOU-PA-2-D-CPP									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.01888	0.12076	0.13964	0.04842	0.07047	0.11889	156.5%	-41.6%	-14.9%
Mid-peak	0.01888	0.05984	0.07872	0.04842	0.06337	0.11179	156.5%	5.9%	42.0%
Off-Peak	0.01888	0.03719	0.05607	0.02443	0.04213	0.06656	29.4%	13.3%	18.7%
Winter Season									
Mid-peak	0.01888	0.05377	0.07265	0.03126	0.05323	0.08449	65.6%	-1.0%	16.3%
Off-Peak	0.01888	0.04279	0.06167	0.02883	0.04236	0.07119	52.7%	-1.0%	15.4%
Super-Off-Peak				0.02745	0.03618	0.06363			
Customer Charge - $/month	43.15	0.00	43.15	43.15	0.00	43.15	0.0%		0.0%
Facilities Related									
Demand Charge - $/kW	11.47	0.00	11.47	8.90	0.00	8.90	-22.4%		-22.4%
Time Related Demand Charge - $/kW									
Summer Season									
On-Peak	0.00	12.24	12.24	2.55	10.60	13.15		-13.4%	7.4%
Mid-Peak	0.00	2.21	2.21	0.00	0.00	0.00		-100.0%	-100.0%
Winter Season									
Mid-Peak				0.00	1.86	1.86			
Wind Machine Credit- $/kW	0.00	(8.30)	(8.30)	0.00	(6.68)	(6.68)		19.5%	19.5%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.12)	0.00	(0.12)	(0.08)	0.00	(0.08)	33.3%		33.3%
Above 50 kV but below 220 kV	(3.97)	0.00	(3.97)	(2.71)	0.00	(2.71)	31.7%		31.7%
At 220 kV	(9.10)	0.00	(9.10)	(6.69)	0.00	(6.69)	26.5%		26.5%
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV	0.00	(0.25)	(0.25)	(0.04)	(0.10)	(0.14)		60.0%	44.0%
Above 50 kV but below 220 kV	0.00	(0.69)	(0.69)	(1.05)	(0.27)	(1.32)		60.9%	-91.3%
At 220 kV	0.00	(0.70)	(0.70)	(2.55)	(0.27)	(2.82)		61.4%	-302.9%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	0.00000	(0.00136)	(0.00136)	(0.00014)	(0.00080)	(0.00094)		41.2%	30.9%
Above 50 kV but below 220 kV	0.00000	(0.00300)	(0.00300)	(0.00397)	(0.00177)	(0.00574)		41.0%	-91.3%
At 220 kV	0.00000	(0.00303)	(0.00303)	(0.00964)	(0.00179)	(0.01143)		40.9%	-277.2%
CPP Event Energy Charge - $/kWh	0.00000	0.68727	0.68727	0.00000	0.40000	0.40000		-41.8%	-41.8%
Summer CPP Non-Event Credit									
On-Peak Demand Credit - $/kW	0.00	(3.54)	(3.54)	0.00	(2.84)	(2.84)		19.8%	19.8%
California Climate Credit - $/kWh/Meter/Month	(0.00400)	0.00000	(0.00400)	(0.00412)	0.00000	(0.00412)	-3.0%		-3.0%

	January 2018 Rates			Proposed 2018 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
TOU-PA-2, GF-A									
Energy Charge - $/kWh									
Summer Season									
On-Peak				0.12327	0.18468	0.30795			
Mid-peak				0.04896	0.07484	0.12380			
Off-Peak				0.02602	0.04610	0.07212			
Winter Season									
Mid-peak				0.03684	0.06291	0.09975			
Off-Peak				0.02291	0.04053	0.06344			
Customer Charge - $/month				43.15	0.00	43.15			
Facilities Related									
Demand Charge - $/kW				7.59	0.00	7.59			
Wind Machine Credit- $/kW				0.00	(6.68)	(6.68)			
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV				(0.00024)	(0.00114)	(0.00138)			
From 51 kV to 219 kV				(0.00754)	(0.00270)	(0.01024)			
220 kV and above				(0.01850)	(0.00272)	(0.02122)			
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV				(0.07)	0.00	(0.07)			
From 51 kV to 219 kV				(2.19)	0.00	(2.19)			
220 kV and above				(5.38)	0.00	(5.38)			
California Climate Credit - $/kWh/Meter/Month				(0.00412)	0.00000	(0.00412)			
TOU-PA-2, GF-B									
Energy Charge - $/kWh									
Summer Season									
On-Peak				0.01936	0.05122	0.07058			
Mid-peak				0.01936	0.04735	0.06671			
Off-Peak				0.01936	0.04610	0.06546			
Winter Season									
Mid-peak				0.01936	0.06291	0.08227			
Off-Peak				0.01936	0.04053	0.05989			
Customer Charge - $/month				43.15	0.00	43.15			
Facilities Related									
Demand Charge - $/kW				11.99	0.00	11.99			
Time Related Demand Charge - $/kW									
Summer Season									
On-Peak				0.00	8.00	8.00			
Mid-Peak				0.00	2.44	2.44			
Wind Machine Credit- $/kW				0.00	(6.68)	(6.68)			
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV				-0.13	0.00	(0.13)			
From 51 kV to 219 kV				-3.99	0.00	(3.99)			
220 kV and above				-9.78	0.00	(9.78)			
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV				0.00	(0.12)	(0.12)			
From 51 kV to 219 kV				0.00	(0.34)	(0.34)			
220 kV and above				0.00	(0.34)	(0.34)			
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV				0.00000	-0.00080	(0.00080)			
From 51 kV to 219 kV				0.00000	-0.00177	(0.00177)			
220 kV and above				0.00000	-0.00179	(0.00179)			
California Climate Credit - $/kWh/Meter/Month				(0.00412)	0.00000	(0.00412)			

	January 2018 Rates			Proposed 2018 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
TOU-PA-3-RTP									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.02060	Variable*	Variable*	0.04082	Variable*	Variable*	98.2%		
Mid-peak				0.04082	Variable*	Variable*			
Off-Peak				0.02221	Variable*	Variable*			
Winter Season									
Mid-peak				0.02782	Variable*	Variable*			
Off-Peak				0.02628	Variable*	Variable*			
Super-Off-Peak				0.02338	Variable*	Variable*			
Customer Charge - $/month	217.03	0.00	217.03	217.03	0.00	217.03	0.0%		0.0%
Facilities Related									
Demand Charge - $/kW	11.56	0.00	11.56	9.18	0.00	9.18	-20.6%		-20.6%
Time Related Demand Charge - $/kW									
Summer Season									
On-Peak				2.68	0.00	2.68			
Mid-Peak				0.00	0.00	0.00			
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.15)	0.00	(0.15)	(0.09)	0.00	(0.09)	40.0%		40.0%
Above 50 kV but below 220 kV	(4.84)	0.00	(4.84)	(3.40)	0.00	(3.40)	29.8%		29.8%
At 220 kV	(8.77)	0.00	(8.77)	(6.57)	0.00	(6.57)	25.1%		25.1%
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV				(0.04)	0.00	(0.04)			
From 51 kV to 219 kV				(1.10)	0.00	(1.10)			
220 kV and above				(2.68)	0.00	(2.68)			
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	0.00000	(0.00178)	(0.00178)	(0.00011)	(0.00108)	(0.00119)		39.3%	33.1%
Above 50 kV but below 220 kV	0.00000	(0.00420)	(0.00420)	(0.00308)	(0.00252)	(0.00560)		40.0%	-33.3%
At 220 kV	0.00000	(0.00424)	(0.00424)	(0.00752)	(0.00254)	(0.01006)		40.1%	-137.3%
Power Factor Adjustment - $/kVA									
Greater than 50 kV	0.47	0.00	0.47	0.54	0.00	0.54	14.9%		14.9%
50 kV or less	0.55	0.00	0.55	0.60	0.00	0.60	9.1%		9.1%
TOU-PA-3-E									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.02060	0.25857	0.27917	0.05512	0.26032	0.31544	167.6%	0.7%	13.0%
Mid-peak	0.02060	0.07084	0.09144	0.05512	0.05711	0.11223	167.6%	-19.4%	22.7%
Off-Peak	0.02060	0.03457	0.05517	0.02794	0.03849	0.06643	35.6%	11.3%	20.4%
Winter Season									
Mid-peak	0.02060	0.04992	0.07052	0.04016	0.06686	0.10702	95.0%	33.9%	51.8%
Off-Peak	0.02060	0.03977	0.06037	0.03569	0.05326	0.08895	73.3%	33.9%	47.3%
Super-Off-Peak				0.02456	0.01939	0.04395			
Customer Charge - $/month	217.03	0.00	217.03	217.03	0.00	217.03	0.0%		0.0%
Facilities Related									
Demand Charge - $/kW	11.56	0.00	11.56	7.84	0.00	7.84	-32.2%		-32.2%
Power Factor Adjustment - $/kVA									
Greater than 50 kV	0.47	0.00	0.47	0.54	0.00	0.54	14.9%		14.9%
50 kV or less	0.55	0.00	0.55	0.60	0.00	0.60	9.1%		9.1%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.15)	0.00	(0.15)	(0.07)	0.00	(0.07)	53.3%		53.3%
Above 50 kV but below 220 kV	(4.84)	0.00	(4.84)	(2.71)	0.00	(2.71)	44.0%		44.0%
At 220 kV	(8.77)	0.00	(8.77)	(5.23)	0.00	(5.23)	40.4%		40.4%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	0.00000	(0.00178)	(0.00178)	(0.00021)	(0.00108)	(0.00129)		39.3%	27.5%
Above 50 kV but below 220 kV	0.00000	(0.00420)	(0.00420)	(0.00656)	(0.00252)	(0.00908)		40.0%	-116.2%
At 220 kV	0.00000	(0.00424)	(0.00424)	(0.01482)	(0.00254)	(0.01736)		40.1%	-309.4%

	January 2018 Rates			Proposed 2018 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
TOU-PA-3-D									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.02060	0.10551	0.12611	0.04082	0.06350	0.10432	98.2%	-39.8%	-17.3%
Mid-peak	0.02060	0.05426	0.07486	0.04082	0.05711	0.09793	98.2%	5.3%	30.8%
Off-Peak	0.02060	0.03457	0.05517	0.02221	0.03849	0.06070	7.8%	11.3%	10.0%
Winter Season									
Mid-peak	0.02060	0.04992	0.07052	0.02782	0.05054	0.07836	35.0%	1.2%	11.1%
Off-Peak	0.02060	0.03977	0.06037	0.02628	0.04243	0.06871	27.6%	6.7%	13.8%
Super-Off-Peak				0.02338	0.02721	0.05059			
Customer Charge - $/month	217.03	0.00	217.03	217.03	0.00	217.03	0.0%		0.0%
Minimum Charge - $/kW									
Summer Season	0.00	0.00	0.00	0.00	0.00	0.00			
Winter Season	0.00	0.00	0.00	0.00	0.00	0.00			
Facilities Related									
Demand Charge - $/kW	11.56	0.00	11.56	9.18	0.00	9.18	-20.6%		-20.6%
Time Related Demand Charge - $/kW									
Summer Season									
On-Peak	0.00	10.61	10.61	2.68	10.76	13.44		1.4%	26.7%
Mid-Peak	0.00	1.71	1.71	0.00	0.00	0.00		-100.0%	-100.0%
Winter Season									
Mid-Peak	0.00	0.00	0.00	0.00	1.91	1.91			
Off-Peak	0.00	0.00	0.00	0.00	0.00	0.00			
Power Factor Adjustment - $/kVA									
Greater than 50 kV	0.47	0.00	0.47	0.54	0.00	0.54	14.9%		14.9%
50 kV or less	0.55	0.00	0.55	0.60	0.00	0.60	9.1%		9.1%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.15)	0.00	(0.15)	(0.09)	0.00	(0.09)	40.0%		40.0%
From 51 kV to 219 kV	(4.84)	0.00	(4.84)	(3.40)	0.00	(3.40)	29.8%		29.8%
220 kV and above	(8.77)	0.00	(8.77)	(6.57)	0.00	(6.57)	25.1%		25.1%
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV	0.00	(0.22)	(0.22)	(0.04)	(0.10)	(0.14)		54.5%	36.4%
From 51 kV to 219 kV	0.00	(0.61)	(0.61)	(1.10)	(0.27)	(1.37)		55.7%	-124.6%
220 kV and above	0.00	(0.62)	(0.62)	(2.68)	(0.27)	(2.95)		56.5%	-375.8%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	0.00000	(0.00134)	(0.00134)	(0.00011)	(0.00080)	(0.00091)		40.3%	32.1%
From 51 kV to 219 kV	0.00000	(0.00297)	(0.00297)	(0.00308)	(0.00176)	(0.00484)		40.7%	-63.0%
220 kV and above	0.00000	(0.00300)	(0.00300)	(0.00752)	(0.00178)	(0.00930)		40.7%	-210.0%
TOU-PA-3-E5to8									
Energy Charge - $/kWh									
Summer Season									
On-Peak				0.08018	0.39862	0.47880			
Mid-peak				0.08018	0.09140	0.17158			
Off-Peak				0.02909	0.03926	0.06835			
Winter Season									
Mid-peak				0.03978	0.07110	0.11088			
Off-Peak				0.03539	0.05663	0.09202			
Super-Off-Peak				0.02445	0.02061	0.04506			
Customer Charge - $/month				217.03	0.00	217.03			
Facilities Related									
Demand Charge - $/kW				7.84	0.00	7.84			
Power Factor Adjustment - $/kVA									
Greater than 50 kV				0.54	0.00	0.54			
50 kV or less				0.60	0.00	0.60			
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV				(0.07)	0.00	(0.07)			
Above 50 kV but below 220 kV				(2.71)	0.00	(2.71)			
At 220 kV				(5.23)	0.00	(5.23)			
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV				(0.00021)	(0.00108)	(0.00129)			
Above 50 kV but below 220 kV				(0.00656)	(0.00252)	(0.00908)			
At 220 kV				(0.01482)	(0.00254)	(0.01736)			

	January 2018 Rates			Proposed 2018 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
TOU-PA-3-D5to8									
Energy Charge - $/kWh									
Summer Season									
On-Peak				0.04918	0.10241	0.15159			
Mid-peak				0.04918	0.09140	0.14058			
Off-Peak				0.02364	0.03926	0.06290			
Winter Season									
Mid-peak				0.02729	0.05181	0.07910			
Off-Peak				0.02583	0.04348	0.06931			
Super-Off-Peak				0.02308	0.02787	0.05095			
Customer Charge - $/month				217.03	0.00	217.03			
Minimum Charge - $/kW									
Summer Season				0.00	0.00	0.00			
Winter Season				0.00	0.00	0.00			
Facilities Related									
Demand Charge - $/kW				9.53	0.00	9.53			
Time Related Demand Charge - $/kW									
Summer Season									
On-Peak				1.77	10.26	12.03			
Mid-Peak				0.00	0.00	0.00			
Winter Season									
Mid-Peak				0.00	2.17	2.17			
Off-Peak				0.00	0.00	0.00			
Power Factor Adjustment - $/kVA									
Greater than 50 kV				0.54	0.00	0.54			
50 kV or less				0.60	0.00	0.60			
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV				(0.09)	0.00	(0.09)			
From 51 kV to 219 kV				(3.58)	0.00	(3.58)			
220 kV and above				(6.92)	0.00	(6.92)			
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV				(0.03)	(0.10)	(0.13)			
From 51 kV to 219 kV				(0.73)	(0.26)	(0.99)			
220 kV and above				(1.77)	(0.26)	(2.03)			
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV				(0.00011)	(0.00081)	(0.00092)			
From 51 kV to 219 kV				(0.00286)	(0.00177)	(0.00463)			
220 kV and above				(0.00730)	(0.00179)	(0.00909)			

	January 2018 Rates			Proposed 2018 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
TOU-PA-3-D-CPP									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.02060	0.10551	0.12611	0.04082	0.06350	0.10432	98.2%	-39.8%	-17.3%
Mid-peak	0.02060	0.05426	0.07486	0.04082	0.05711	0.09793	98.2%	5.3%	30.8%
Off-Peak	0.02060	0.03457	0.05517	0.02221	0.03849	0.06070	7.8%	11.3%	10.0%
Winter Season									
Mid-peak	0.02060	0.04992	0.07052	0.02782	0.05054	0.07836	35.0%	1.2%	11.1%
Off-Peak	0.02060	0.03977	0.06037	0.02628	0.04243	0.06871	27.6%	6.7%	13.8%
Super-Off-Peak				0.02338	0.02721	0.05059			
Customer Charge - $/month	217.03	0.00	217.03	217.03	0.00	217.03	0.0%		0.0%
Facilities Related									
Demand Charge - $/kW	11.56	0.00	11.56	9.18	0.00	9.18	-20.6%		-20.6%
Time Related Demand Charge - $/kW									
Summer Season									
On-Peak	0.00	10.61	10.61	2.68	10.76	13.44		1.4%	26.7%
Mid-Peak	0.00	1.71	1.71	0.00	0.00	0.00		-100.0%	-100.0%
Winter Season									
Mid-Peak	0.00	0.00	0.00	0.00	1.91	1.91			
Off-Peak	0.00	0.00	0.00	0.00	0.00	0.00			
Power Factor Adjustment - $/kVA									
Greater than 50 kV	0.47	0.00	0.47	0.54	0.00	0.54	14.9%		14.9%
50 kV or less	0.55	0.00	0.55	0.60	0.00	0.60	9.1%		9.1%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.15)	0.00	(0.15)	(0.09)	0.00	(0.09)	40.0%		40.0%
Above 50 kV but below 220 kV	(4.84)	0.00	(4.84)	(3.40)	0.00	(3.40)	29.8%		29.8%
At 220 kV	(8.77)	0.00	(8.77)	(6.57)	0.00	(6.57)	25.1%		25.1%
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV	0.00	(0.22)	(0.22)	(0.04)	(0.10)	(0.14)		54.5%	36.4%
Above 50 kV but below 220 kV	0.00	(0.61)	(0.61)	(1.10)	(0.27)	(1.37)		55.7%	-124.6%
At 220 kV	0.00	(0.62)	(0.62)	(2.68)	(0.27)	(2.95)		56.5%	-375.8%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	0.00000	(0.00134)	(0.00134)	(0.00011)	(0.00080)	(0.00091)		40.3%	32.1%
Above 50 kV but below 220 kV	0.00000	(0.00297)	(0.00297)	(0.00308)	(0.00176)	(0.00484)		40.7%	-63.0%
At 220 kV	0.00000	(0.00300)	(0.00300)	(0.00752)	(0.00178)	(0.00930)		40.7%	-210.0%
CPP Event Energy Charge - $/kWh	0.00000	1.37453	1.37453	0.00000	0.40000	0.40000		-70.9%	-70.9%
Summer CPP Non-Event Credit									
On-Peak Demand Credit - $/kW	0.00	(8.94)	(8.94)	0.00	(3.09)	(3.09)		65.4%	65.4%
TOU-PA-3, GF-A									
Energy Charge - $/kWh									
Summer Season									
On-Peak				0.12019	0.17966	0.29985			
Mid-peak				0.04456	0.06772	0.11228			
Off-Peak				0.02403	0.04201	0.06604			
Winter Season									
Mid-peak				0.03148	0.05611	0.08759			
Off-Peak				0.02075	0.03733	0.05808			
Customer Charge - $/month				217.03	0.00	217.03			
Facilities Related									
Demand Charge - $/kW				7.84	0.00	7.84			
Power Factor Adjustment - $/kVA									
Greater than 50 kV				0.54	0.00	0.54			
50 kV or less				0.60	0.00	0.60			
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV				(0.07)	0.00	(0.07)			
Above 50 kV but below 220 kV				(2.53)	0.00	(2.53)			
At 220 kV				(5.23)	0.00	(5.23)			
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV				(0.00021)	(0.00108)	(0.00129)			
Above 50 kV but below 220 kV				(0.00716)	(0.00252)	(0.00968)			
At 220 kV				(0.01482)	(0.00254)	(0.01736)			

	January 2018 Rates			Proposed 2018 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
TOU-PA-3, GF-B									
Energy Charge - $/kWh									
Summer Season									
On-Peak				0.01819	0.04668	0.06487			
Mid-peak				0.01819	0.04305	0.06124			
Off-Peak				0.01819	0.04201	0.06020			
Winter Season									
Mid-peak				0.01819	0.05611	0.07430			
Off-Peak				0.01819	0.03733	0.05552			
Customer Charge - $/month				217.03	0.00	217.03			
Minimum Charge - $/kW									
Summer Season				0.00	0.00	0.00			
Winter Season				0.00	0.00	0.00			
Facilities Related									
Demand Charge - $/kW				12.27	0.00	12.27			
Time Related Demand Charge - $/kW									
Summer Season									
On-Peak				0.00	8.89	8.89			
Mid-Peak				0.00	2.42	2.42			
Winter Season									
Mid-Peak				0.00	0.00	0.00			
Off-Peak				0.00	0.00	0.00			
Power Factor Adjustment - $/kVA									
Greater than 50 kV				0.54	0.00	0.54			
50 kV or less				0.60	0.00	0.60			
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV				(0.14)	0.00	(0.14)			
From 51 kV to 219 kV				(4.67)	0.00	(4.67)			
220 kV and above				(9.66)	0.00	(9.66)			
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV				0.00	(0.13)	(0.13)			
From 51 kV to 219 kV				0.00	(0.36)	(0.36)			
220 kV and above				0.00	(0.36)	(0.36)			
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV				0.00000	(0.00080)	(0.00080)			
From 51 kV to 219 kV				0.00000	(0.00176)	(0.00176)			
220 kV and above				0.00000	(0.00178)	(0.00178)			
AP-I									
<=200kW									
Summer Average On Peak - $/kW	(19.05)	0.00	(19.05)	(15.92)	0.00	(15.92)	16.4%		16.4%
Summer Average Mid - Peak - $/kW	(4.54)	0.00	(4.54)	0.00	0.00	0.00	100.0%		100.0%
Summer Average Off - Peak - $/kW				0.00	0.00	0.00			
Winter Average Mid - Peak - $/kW	(1.62)	0.00	(1.62)	(8.82)	0.00	(8.82)	-444.4%		-444.4%
>=200kW									
Summer Average On Peak - $/kW	(19.05)	0.00	(19.05)	(15.92)	0.00	(15.92)	16.4%		16.4%
Summer Average Mid - Peak - $/kW	(4.54)	0.00	(4.54)	0.00	0.00	0.00	100.0%		100.0%
Summer Average Off - Peak - $/kW				0.00	0.00	0.00			
Winter Average Mid - Peak - $/kW	(1.62)	0.00	(1.62)	(8.82)	0.00	(8.82)	-444.4%		-444.4%
Optional CPP Rider < 200 kW									
CPP Event Energy Charge - $/kWh									
TOU-PA-2	0.00000	1.37453	1.37453	0.00000	0.40000	0.40000		-70.9%	-70.9%
Summer Non-Event Demand Credit - $/kW									
TOU-PA-2	0.00	(7.07)	(7.07)	0.00	(2.84)	(2.84)		59.8%	59.8%
Default CPP Rider > 200 kW									
TOU-PA-3									
2 p.m. to 6 p.m CPP Event Energy Charge - $/kWh	0.00000	1.37453	1.37453	0.00000	0.40000	0.40000		-70.9%	-70.9%
Summer On Peak Demand Credit - $/kW	0.00	(8.94)	(8.94)	0.00000	(3.09)	(3.09)		65.4%	65.4%

Appendix C

Updated TOU Periods

	Updated TOU Periods (D.18-07-006)	Ag & Pump Optional Rate TOU Periods
SUMMER		
On-Peak	4pm-9pm (weekdays)	5pm-8pm (weekdays)
Mid-Peak	4pm-9pm (weekends)	5pm-8pm (weekends)
Off-Peak	All except 4pm-9pm (all days)	All except 5pm-8pm (all days)
Super-Off-Peak	n/a	n/a
WINTER		
On-Peak	n/a	n/a
Mid-Peak	4pm-9pm (all days)	5pm-8pm (all days)
Off-Peak	9pm-8am (all days)	8pm-8am (all days)
Super-Off-Peak	8am-4pm (all days)	8am-5pm (all days)