# Energy Data Source LP

Comments on

# **Competitive Metering** Rulemaking Project 26359

# Public Utility Commission of Texas

**September 17, 2002** 



## **Current Status**

#### Generally, electric deregulation is succeeding. Texas is "the model" with enviable:

- Market structure.
- Marketplace stability.
  Security of supply.
- Security of delivery.

#### But, we're struggling with:

- Information flow
  - Switchovers/move-ins
  - ➤ Billing
- Demand-side response programs
  - Practically non-existent or non-functional.
  - > No broad framework for direct load control.
  - No competition in TOU rates.

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- Price competitiveness.

## **Areas for Improvement**

- Q: Why a poor performance so far on information flow and demand-side response?
- A: Current metering framework is unsuited to a competitive electric marketplace.

#### Current metering framework <u>fails</u> to provide:

- x Economic consequences for poor performance.
- x Economic incentives for improvements.
- x Meaningful deployment of interval metering.
- x Progress in demand-side response programs.
- x Equitable deployment of time-of-use or interval metering.
- x Incentives for innovation (e.g, combining metering with broadband deployment, meter financing options).



#### How our current metering framework is failing us:

• Why does it cost \$400-500 to install an interval data recorder (IDR) in Dallas or Houston and only \$250 in Boston?

• Why does it cost \$400-500 to have a TDSP install IDR in Texas when IDR's are available for \$30-100?

• Why do TDSP's in Texas have perhaps 10,000 IDR's in operation when:

- Puget Sound Energy has 1.3 million in place?
- Kansas City Power & Light has 500,000 in place?

PECO Energy (Philadelphia) has 1.3 million in and 800,000 going in this year?

➢As one of over a hundred such examples, Crow Wing Power cooperative has installed 25,000?

#### The current metering framework is failing us.



# Solution

Suggestion: Texas' current framework for commodity competition is a good model. Let's extend it to metering:

- Leverage the momentum of existing utilities. Keep them in the game and allow them opportunities to grow.
- Open opportunities for additional qualified providers to own, install, maintain, and operate metering and collect and distribute metering data.
- Level the playing field with appropriate regulatory oversight.
- Safeguard the rights of individual consumers.
- Maintain stability through careful transition planning.



# Conclusion

#### In conclusion:

- Electric deregulation exists because greater <u>efficiency</u> can be achieved through competition.
- Consumers will tend to favor the more efficient of competing choices in pursuing their goals.
- How can consumers make good decisions without timely and accurate knowledge of how much they're consuming? They cannot.
- Consumers must have much more and much better metering choices than the current metering framework can provide.
- Let's <u>extend the current model</u>—the nation's "best practice"—to benefit from competition in metering, too.

