

April 9, 2020

Ms. Kimberley A. Campbell, Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4300

Re: Docket Nos. E-2, Sub 1249, E-7, Sub 1237, and E-22, Sub 585

Dear Ms. Campbell:

In connection with the above-referenced dockets, the Public Staff filed comments earlier today that indicated it was attaching a data request it had served on Carolina Utility Customers Association, Inc., but there was no attachment. The data request is attached to this letter.

Sincerely,

Electronically submitted
/s/ Lucy E. Edmondson
Staff Attorney
lucy.edmondson@psncuc.nc.gov

c: Parties of Record

**Data Request of the Public Staff - North Carolina Utilities Commission
to the Carolina Utility Customers Association, Inc.
Docket Nos. E-2, Sub 1249; E-7, Sub 1237, and E-22 Sub 585**

The Public Staff – North Carolina Utilities Commission (Public Staff), by and through its legal counsel, hereby submits the following data request to Carolina Utility Customers Association, Inc. (CUCA). Please forward your responses to the following data requests by April 13, 2020.

1. The Public Staff has identified four main areas of relief in the petition:
 - a. Temporarily eliminate the minimum billing demand and maximum contract demand charges,
 - b. Prorate the current monthly demand charges for a partial month for sites that have curtailed or expanded consumption,
 - c. Review other tariff provisions to provide as much flexibility as possible, and
 - d. Keep these provisions in effect for 60 days for commercial customers and 6 months for industrial customers.

Please confirm that this summary is correct and that no other relief is requested.

2. Several rate schedules in the attached spreadsheet were not included in the petition. Please explain why certain schedules were not included in the petition.



3. For each rate schedule in the attached spreadsheet, please identify the current minimum and maximum demand charges, and other specific tariff conditions from which CUCA is seeking relief.
4. For each schedule, please provide an example of the demand and revenue impacts associated with the relief requested. If possible, please include a comparison of usage for January 2020 to April 2020 for a typical customer on each schedule identified in the spreadsheet.
5. What is CUCA's proposal as to how each utility should address any revenue change resulting from implementing the relief sought?
6. Please explain the statement at the bottom of page 3 of the petition that implies certain demand charge provisions or minimum bill provisions impose a penalty for increased consumption due to increased production related to COVID-19.
7. Does CUCA have any members in the DENC territory? If so, are they in the industrial or commercial class?

Schedule	Included in CUCA petition?		Description of Demand-Related Minimum Billing Provisions & Other Applicable Terms and Conditions
	Yes	No	
DENC			
5	x		Minimum charge = \$/kW (seasonal rate) applied to highest monthly 30-minute demand. Applicable to customers using >3,000kWh
5C	x		No minimum demand charge. Rates are all \$/kWh.
5P	x		Minimum "distribution demand" = \$/kW (seasonal rate) applied to highest of either (1) 30-minute monthly kW demand or (2) contract demand. Adjusted for power factor if needed.
6C	x		Minimum charge = the highest of (1) contract demand (2) highest kW in last 12 months or (3) 500 kW.
6L	x		<u>Minimum charge for power supply demand</u> = highest of (1) 30-minute on-peak monthly demand for month or (2) 75% of highest on-peak kW demand for June-Sept. <u>Minimum distribution peak demand and contract demand</u> = the highest of (1) actual kW demand delivered or (2) 3,000 kW.
6P	x		<u>Billed charge for power supply demand</u> = highest of (1) 30-minute on-peak monthly demand for month or (2) average kW demand for month [monthly kWh / 720 hours]. <u>Billed distribution peak demand and contract demand</u> = the highest of (1) average 30-minute kW demand for month or (2) 500 kW. Minimum distribution demand will be the contracted demand, adjusted for power factor if needed. Billed for RKVA demand if distribution demand >1 MW.
6VP	x		Minimum demand charge = the highest of (1) maximum kW demand delivered in month or (2) 10 MW.
7	x		No minimum demand charge condition.
10	x		Minimum charge = the highest of (1) actual monthly peak demand, (2) contract demand, or (3) 500 kW
LGS-RTP-CBL (limited to 15 customers)		x	<u>Customer Baseline (CBL)</u> for existing customer with 11 months of billing data = 75% of peak summer demand. New customers will have billing demand set at 50% of the highest of (1) max monthly on-peak demand or (2) max kW demand that is initially established. Restrictions on changing CBL outside of anniversary date. If CBL falls below 50% of max monthly peak demand CBL will be adjusted to the same 50% of max monthly peak demand. <u>Transmission demand</u> = the highest of (1) average on-peak kW in month less CBL, but not less than zero, (2) 75% of highest kW for summer [June-Sept] less CBL, but not less than zero, or (3) 1 MW.
LGS-RTP-Econ Dev. (limited to 6 customers)		x	Minimum charge for <u>distribution peak and contract demand</u> = highest of (1) average kW demand in month or (2) 85% of average kVA demand in month. Distribution contract demand = highest of (1) max demand supplied or (2) 10 MW. <u>Transmission demand</u> = the highest of (1) average on-peak kW in month, (2) 75% of highest kW for summer [June-Sept], or (3) 1 MW.
NS		x	Minimum billing demand = highest of (1) average kW demand since Sept 1, 2000, (2) 95% of average kVA demand since Sept 1, 2000, or (3) 85 MW.
30		x	Minimum charge = \$/kW (seasonal rate) applied to highest monthly 30-minute demand. Applicable to customers using >3,000kWh
Service Regulations		x	The only reference that addresses changing load conditions is Section VIII.C, which requires customer to evaluate best rate schedule when load/operating conditions change.

DEP			
MGS	x		Minimum billing demand = highest of (1) max 15-minute kW demand in month, (2) 80% of summer [July-Oct] demand, (3) 60% of winter [Nov-June] demand, (4) 75% of contract demand, or (5) 25 kW.
SGS-TOU, CH-TOUE, GS-TEX, APH-TES, CSG, CSE		x	Minimum bill is sum of BCC, kWh charge [\$/kWh], and kW charge [\$/kW of demand from either the contract demand or 15-minute demand in month for last 11 months, whichever is highest].
LGS	x		Minimum bill = 1,000 kW. Minimum billing demand = highest of (1) 80% of max monthly 15-minute demand July-Oct, (2) 60% of max monthly 15-minute demand Nov-June, (3) 75% of contract demand, or (4) 1,000 kW.
LGS-TOU	x		Minimum bill = 1,000 kW at the off-peak excess demand rate. On-peak billing demand is highest 15-minute on-peak kW for month. Off-peak billing demand is highest 15-minute off-peak demand minus the on-peak billing demand.
LGS-RTP	x		Once a CBL is established, changes can be made for (1) installation of EE measures, (2) permanent changes in equipment, (3) one-time extraordinary events like natural disasters, (4) plant shutdowns or random variations in load, or (5) other ongoing changes in demand. Facility demand charges = highest of (1) contract demand or (2) max monthly 15-minute demand in excess of max 15-minute demand included in CBL.
Service Regulations		x	Section 1.F - Provisions to address physical damage to customer's premises which allows customer to request a lesser load than original agreement
		x	Section 1.G - Provisions for terminating service.
		x	Section 7.B - Provisions for reducing contract demand.
DEC			
SGS	x		Minimum bill = \$/kW month or year times contract demand. <u>Billing demand</u> the highest of (1) max 30-minute kW in month, (2) 50% of max 30-minute demand [June-Sept], (3) 50% of contract demand, or (4) 30 kW.
LGS	x		Same as SGS
I		x	Same as SGS
OPT-E	x		Minimum bill = \$/kW month of contract demand. No other provisions.
OPT-V (all levels)	x		Minimum bill = \$/kW month or year times contract demand. <u>On-peak billing demand</u> the highest of (1) max 30-minute kW in month, (2) 50% of contract demand or 50% of on-peak contract demand if applicable per contract, or (3) 15 kW. <u>Economy Demand</u> is calculated by comparing the highest of (1) max 30-minute kW in month, or (2) 50% of contract demand, to the on-peak billing demand. Difference between the larger of the max or 50% contract demand and the on-peak demand is the Economy Demand.
HP	x		Minimum bill is calculated as the difference in the bill calculated using normal rates, and the \$/kW month rate times baseline contract demand, plus a separate \$/kW month rate times the difference in contract demand and the baseline contract demand. Provisions in schedule also allow modification of the baseline contract demand.
SGS-TOU-CPP	x		No demand charges included. Minimum bill = BFC
SGS-TOUD-DPP	x		Minimum bill = BFC. Demand charges are in schedule, but no minimum demand required or part of minimum bill.

Service Regulations		x	Leaf H.XIII - provisions for terminating contract due to actions beyond customer's control. No other provisions directly address amending contracts.
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