

Comments on LCO 3920

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- The Independent Consumer Advocate member of the board is a great idea, but it is important that this position comes with full voting rights. The recent storm was not an anomaly. The system worked as designed. Its only built in incentives are to increase shareholder, and executive rewards, and it did that very well. We cannot expect a different outcome unless the incentives are changed. This also includes the penalties for bad performance as well.
- I believe that the bill should also contain language and incentives to make sure that PURA's excellent grid modernization effort will benefit energy producers and consumers, and not just the distributors. Smart meters have benefits far beyond better communicating grid status to aid in recovery and fine tuning. They should be used as part of a widely deployed time of day tariff that will allow loads to be shifted to times of day when energy is available and inexpensive. Besides reducing the need for new generating capacity, this will allow consumers to take advantage of less expensive energy, resulting in savings. It is important that as equipment is selected and rolled out, these other stakeholders have a say.
- The recent storms have underlined our vulnerabilities in terms of resilience. It is certainly true that the response to the storm was inadequate, but we must do more than simply prepare for the worst as storms grow more destructive over time. It is vital to design local storage into the grid, so that things can be kept running. Local backup is also a critical component for using more renewables. Making sure that the incentives are in place to encourage local battery backup should be part of 3920.