CLECA Presentation on Use of Most Current Data in Calculating Coincidence Factor

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CLECA Proposal

- Concern-current process uses historical data from 1-3 years to determine coincidence factor (CF) based on load under contract at time of measurement
- Proposal-historical data submitted by LSEs should be historical consumption of the customers under contract at the time of the submittal deadline
  - Even if served by different LSE in prior year(s)
    - Data available via CISR
  - I year better than 3 years but recognize CEC variability concern
- Reason-losing or adding a high or low CF customers can change allocation of RA to small LSE
  - If sufficient inter-year variability to qualify for use of 3 years of data to determine CF. effect would persist for 3 years

Shell Response

- Supports basing CF on most recent year of an LSE's historical data, rather than 1-3 years
- Opposes proposal to adjust an LSE's historical meter data to reflect addition or subtraction of customers that have migrated to or from the LSE up to the data of LSE's load forecast submittal
  - Cites complexity and concern about double-counting or omission of customers due to uncertainty about timing of when a customer is "under contract" with a particular LSE
    - If approved, says need greater specificity to ensure each LSE's hourly load data are accurate and consistent

CLECA Response

- Intent is accuracy of RA allocation based on most recent load, not complexity
- Open to alternative, like load of LSE under contract as of a date certain
- Welcome input from utilities and LSEs as to the last feasible date to more accurately determine LSE load
  - If LSEs submit data to CEC around March 22, could adjustments be made for load of new or departing customers as of February 15?
- N.B. PJM, ERCOT and Ontario can all track RA obligations for each individual customer that follow the customer when retail providers switch.