

1December 13, 2019

# The Electricity Sector of the Past, Present, and Future

South Carolina Public Service Commission

“Utility of the Future” Workshop

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# Introductions



The Regulatory Assistance Project (RAP) is a global NGO providing technical and policy assistance to government officials, agency staff, and others on energy and environmental issues.

- Foundation-funded; some contracts
- Non-advocacy; no interventions

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# Today's Agenda

1. History, Trends, and Challenges facing Regulation and Markets
2. Distributed Resource Capabilities and Value, and Implications for Compensation, Rate Design, and Planning
3. Best Practices in Resource Planning
4. Approaches to Dealing with Misalignments in Traditional Regulation and Markets
5. Process Options for Moving Change Forward

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# 1 A Very Brief History of Regulation and Trends Shaping the Industry Today



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# Medieval England Accommodations

- Business “affected with the public interest”
- Prices regulated due to monopoly stature



New Inn, Gloucester, 1454



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# US Origins: Munn v. Illinois (1877)

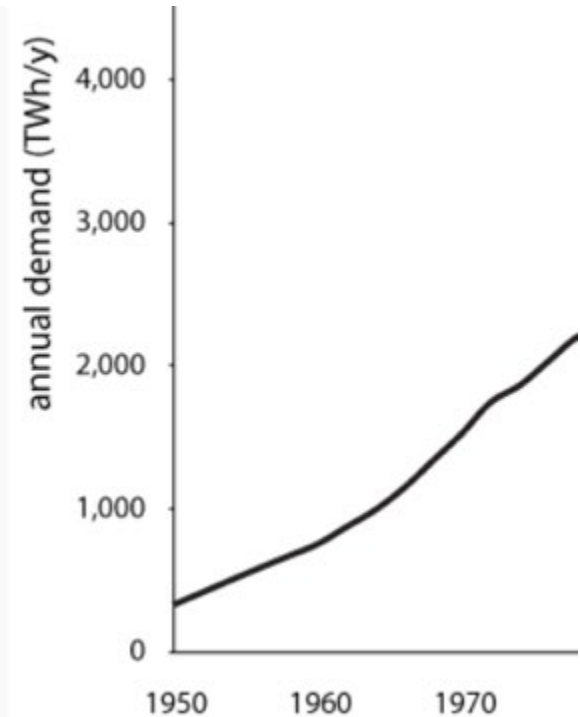
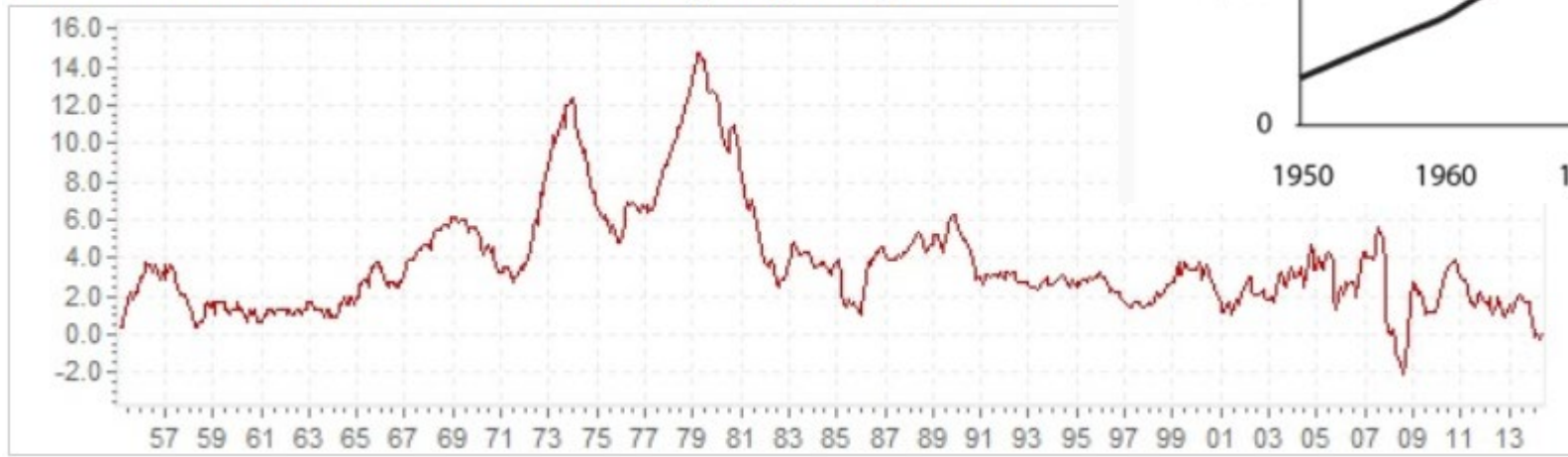
- Grain elevators charging monopoly prices to farmers
- Supreme Court ruled “affected with the public interest” and subject to price regulation



# Roaring 60's and Scary 70's

- Economic Growth
- Load Growth = more power plants
- Increasing inflation = increasing cost of borrowing \$

Chart – historic CPI inflation United States (yearly basis) – full term





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# PURPA: The Public Utility Regulatory Policies Act (1978)

- Requires PUCs to “consider and determine” whether several specific policies should be adopted

## **Rate Design Standards**

- Cost of Service
- Time of Day
- Seasonal
- Interruptible
- Declining Block

## **Utility Service Standards**

- Master Metering
- Fuel Adjustment Clauses
- Information to Consumers
- Termination of Service

- Avoided Cost for Independent Power Qualifying Facilities
- Idea emerging that competition could help US power sector

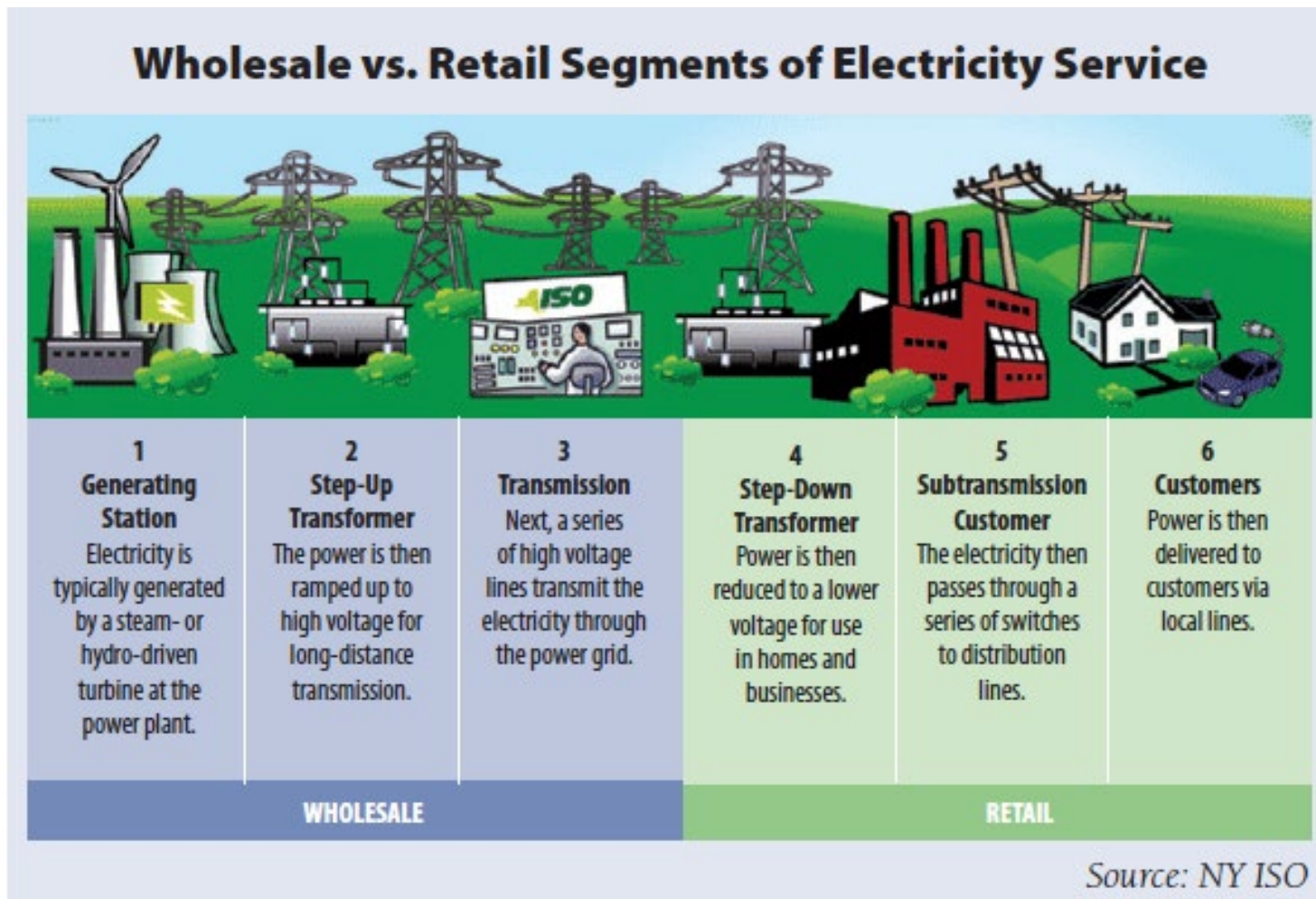
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# The 80's: Rate Increases, Cost Over-runs, and Abandoned Nukes

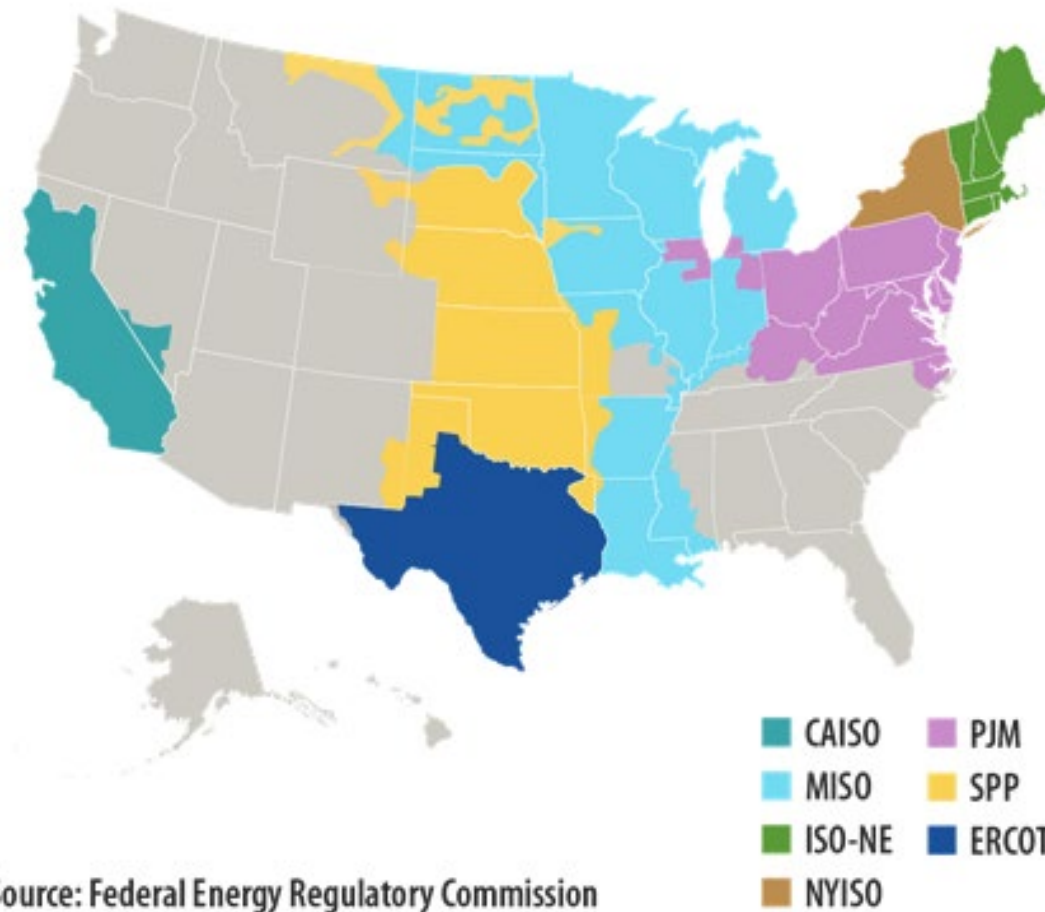
- Expensive New Capacity – pollution and safety equipment
- High rates resulted in low load growth
- Three Mile Island incident led to 50 nuclear plant abandonments
- Led large users to demand “direct access” and restructuring



# Segments of Electric Service



# Wholesale Electric Power Markets

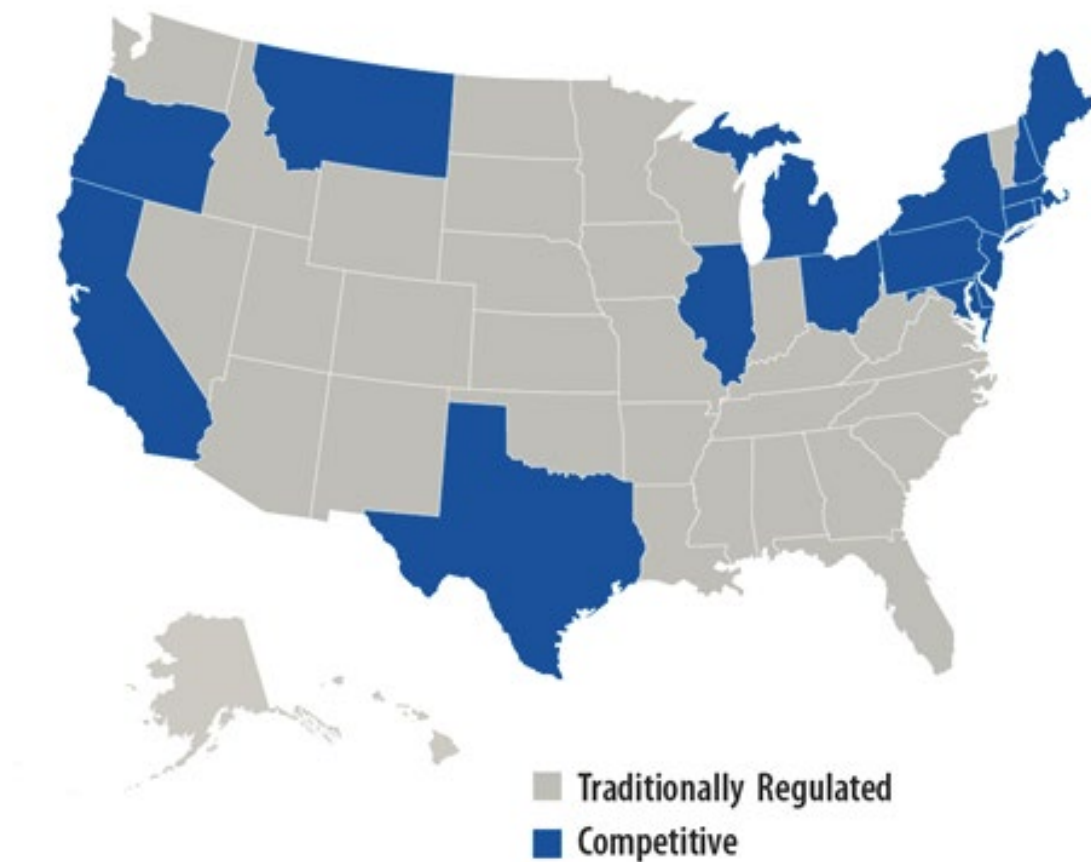


Source: FERC, taken from <https://www.epa.gov/greenpower/us-electricity-grid-markets>



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# Retail Electric Power Markets



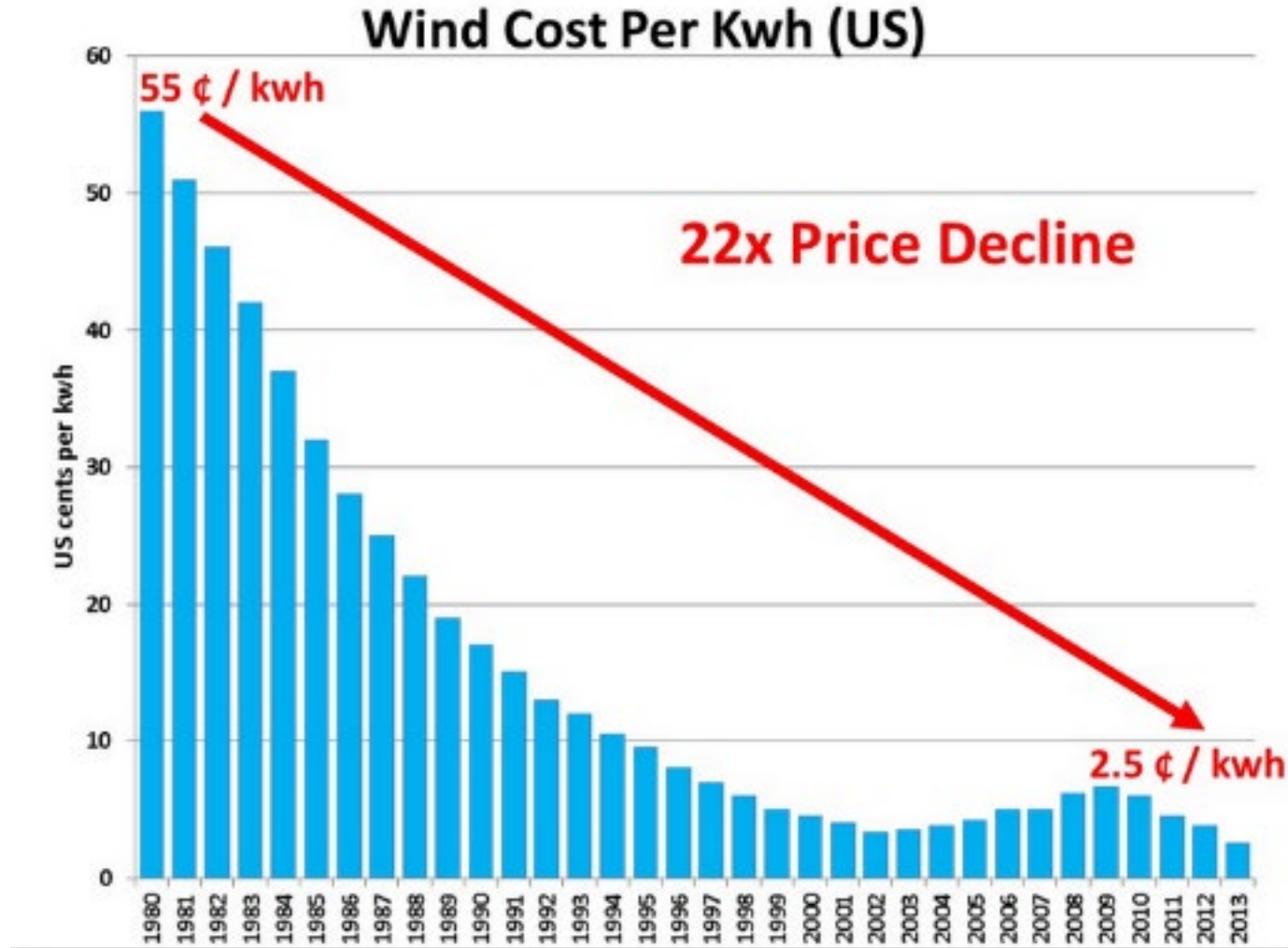
Taken from <https://www.epa.gov/greenpower/us-electricity-grid-markets>

# A few more recent developments

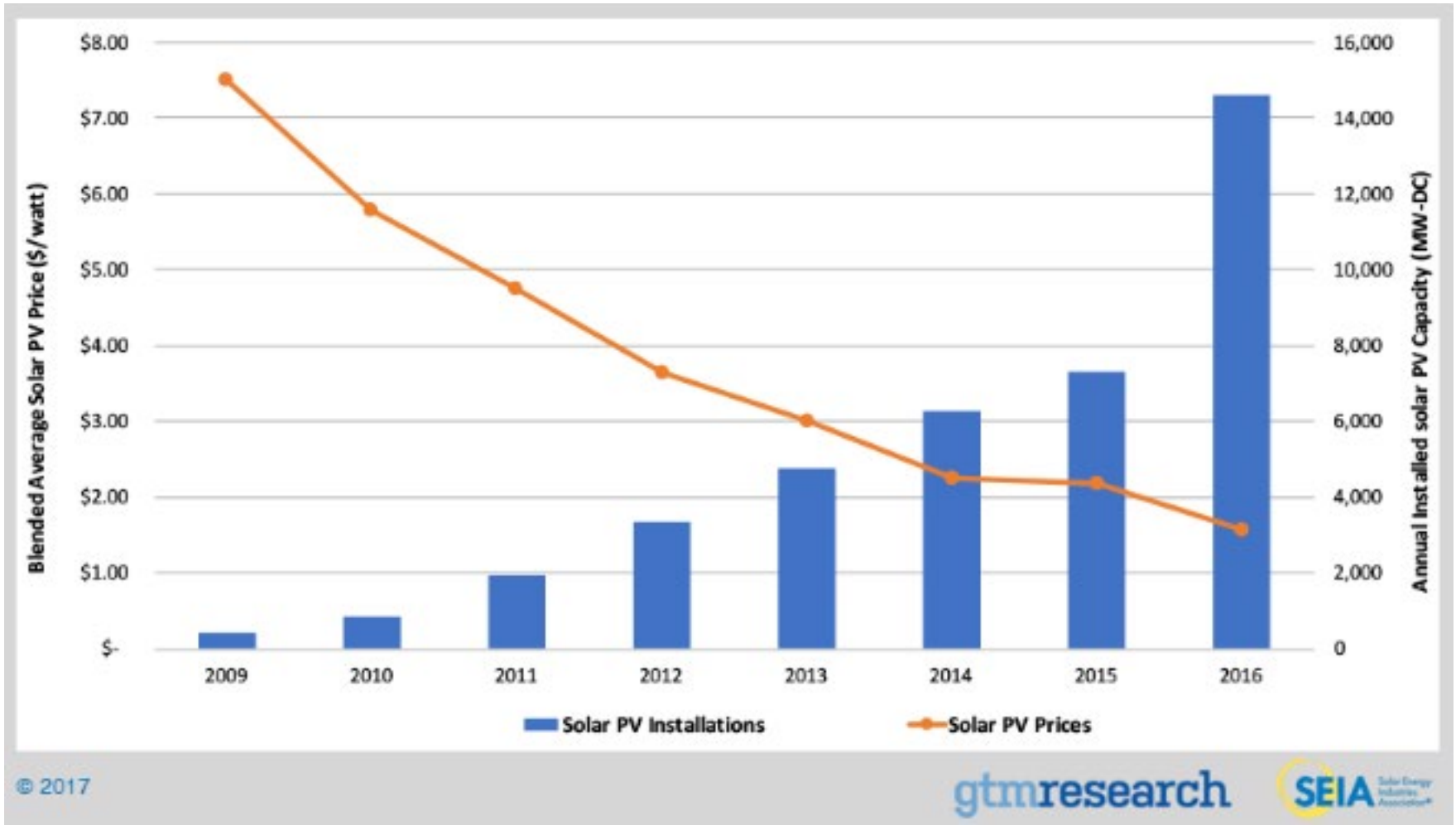


Source: Bloomberg New Energy Finance

# Wind Costs Dropped a Decade Ago



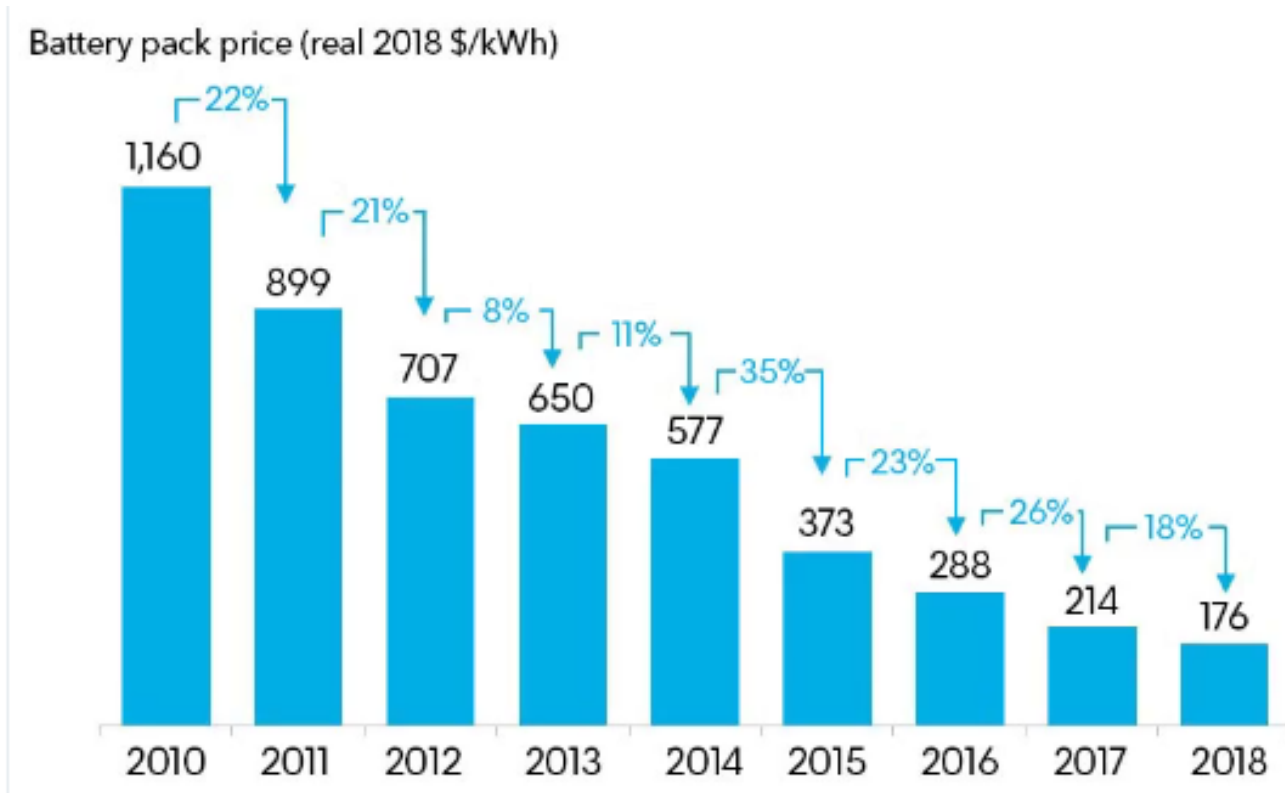
# Solar Is Following Close Behind



Source: Solar Energy Industry Association



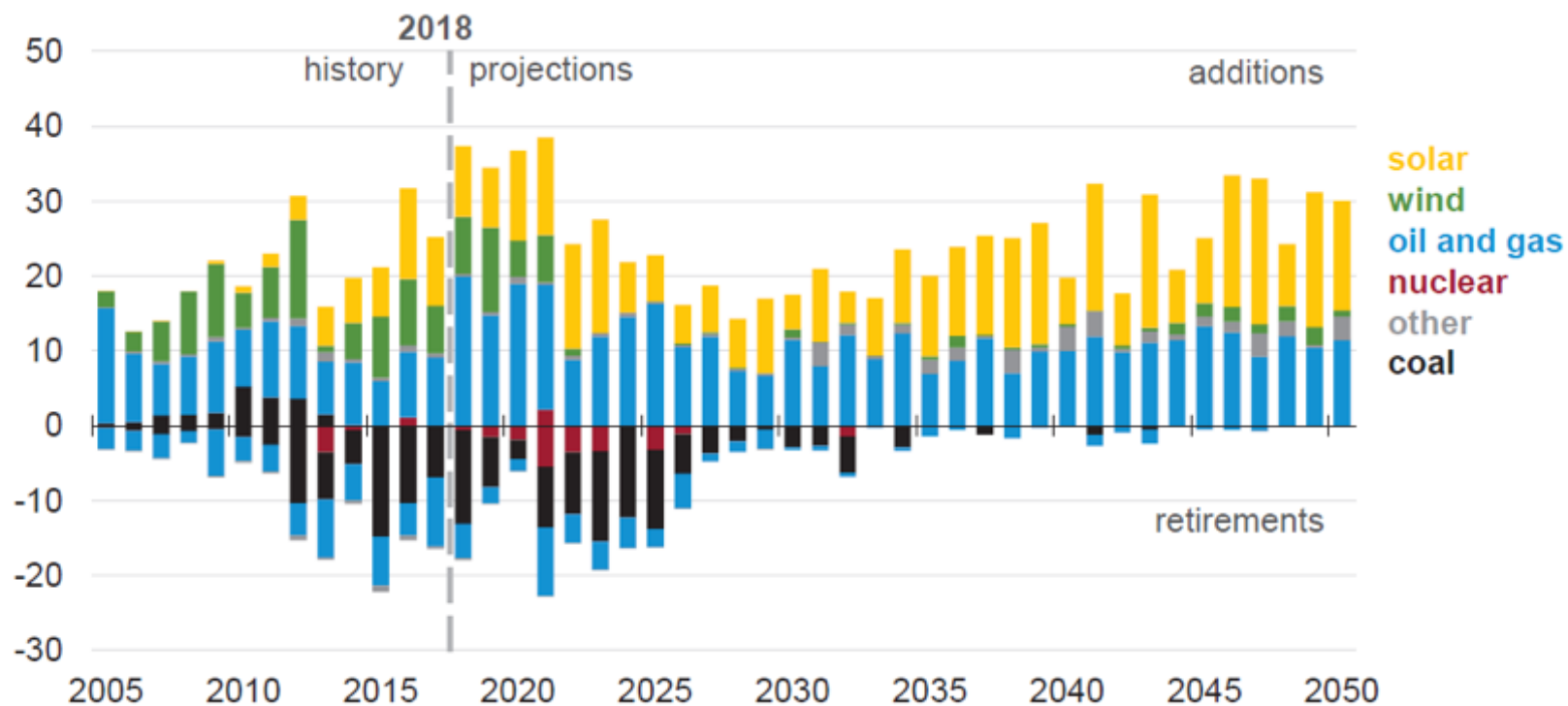
# Batteries, too



Source: Bloomberg NEF. Data adjusted to be in real 2018 dollars.

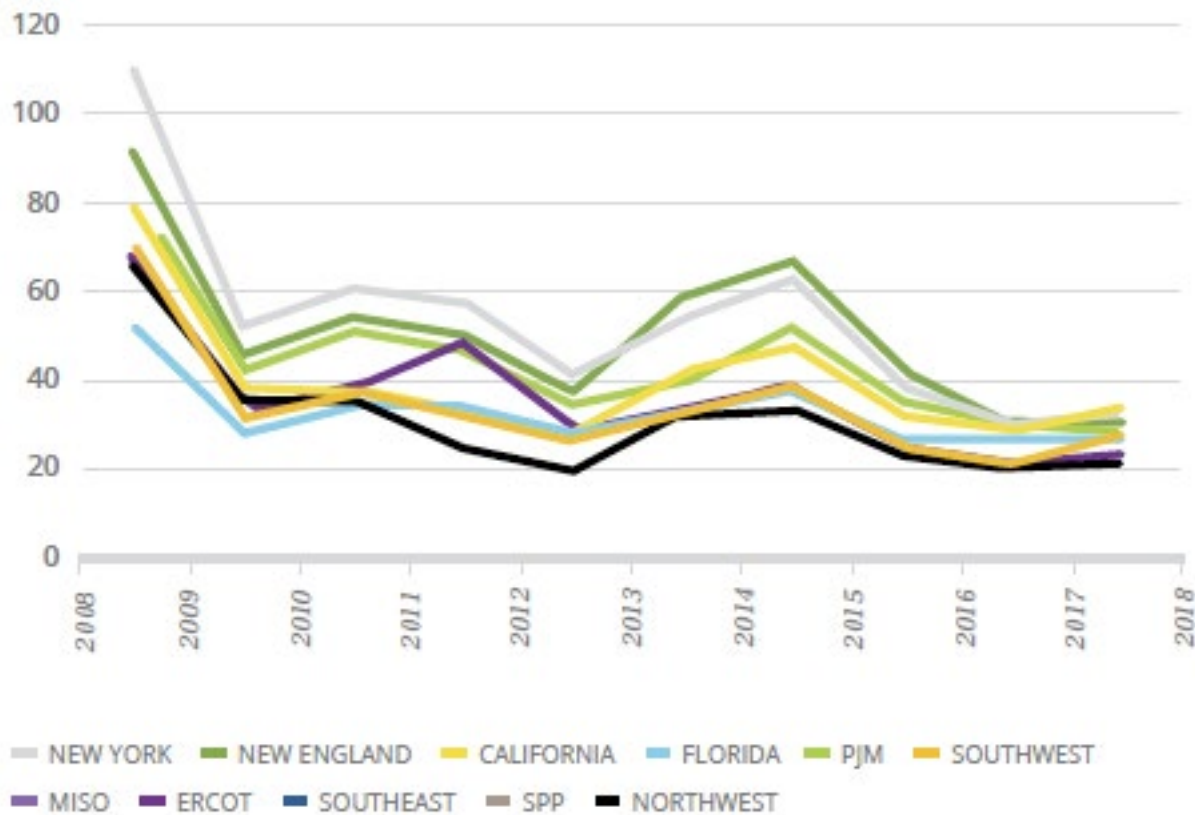
# Changes in Generation Mix

Annual electricity generating capacity additions and retirements (Reference case)  
gigawatts



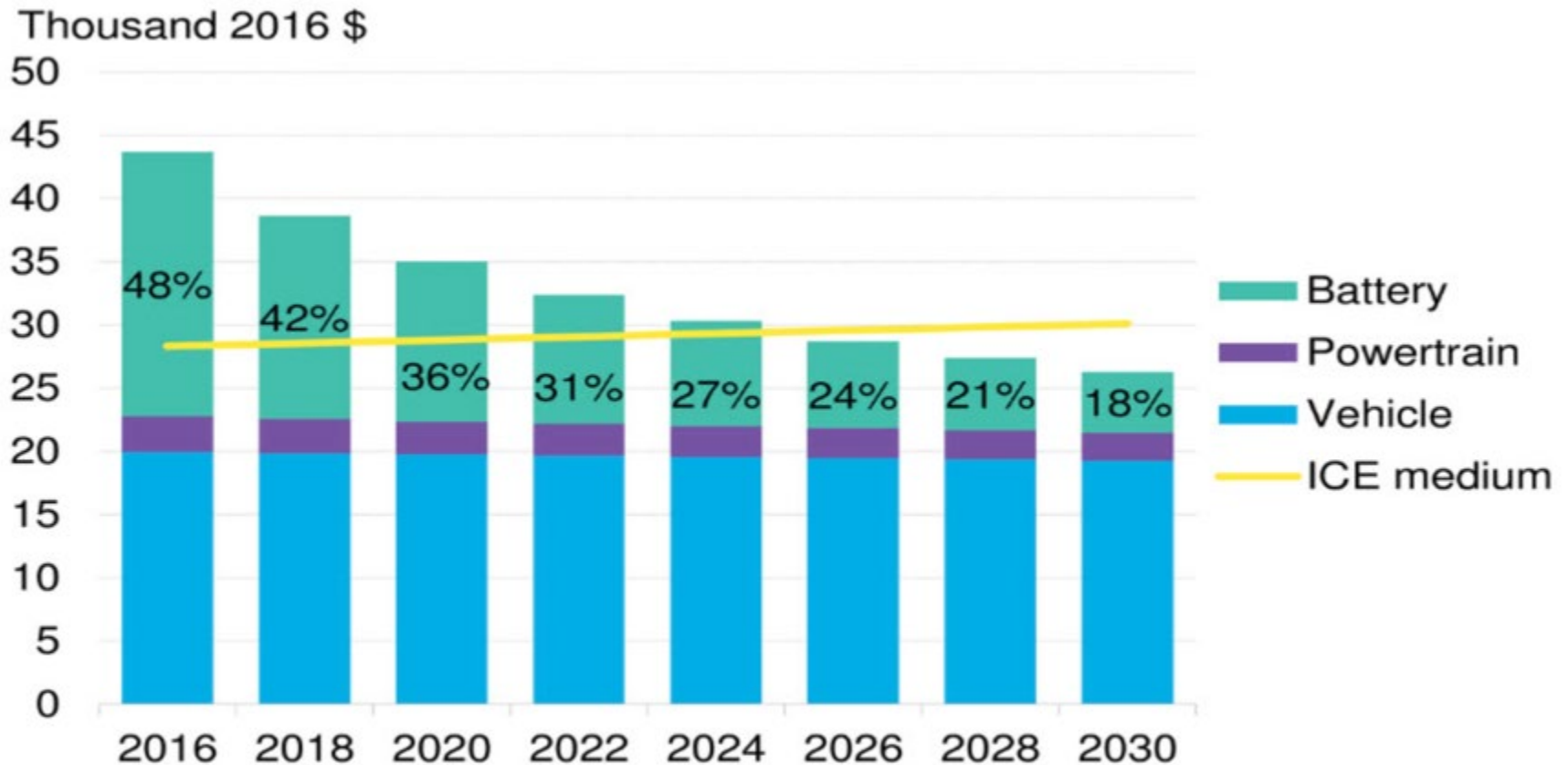
Energy Information Administration, Annual Energy Outlook 2019

# Wholesale Power Prices (\$/MWh – real 2017)



Source: BNEF, 2018. Image taken from Goggin, et al, "Customer Focused and Clean: Power Markets for the Future. Wind Solar Alliance. November 2018.

# EVs Soon to Reach Price Parity



Source: Bloomberg New Energy Finance

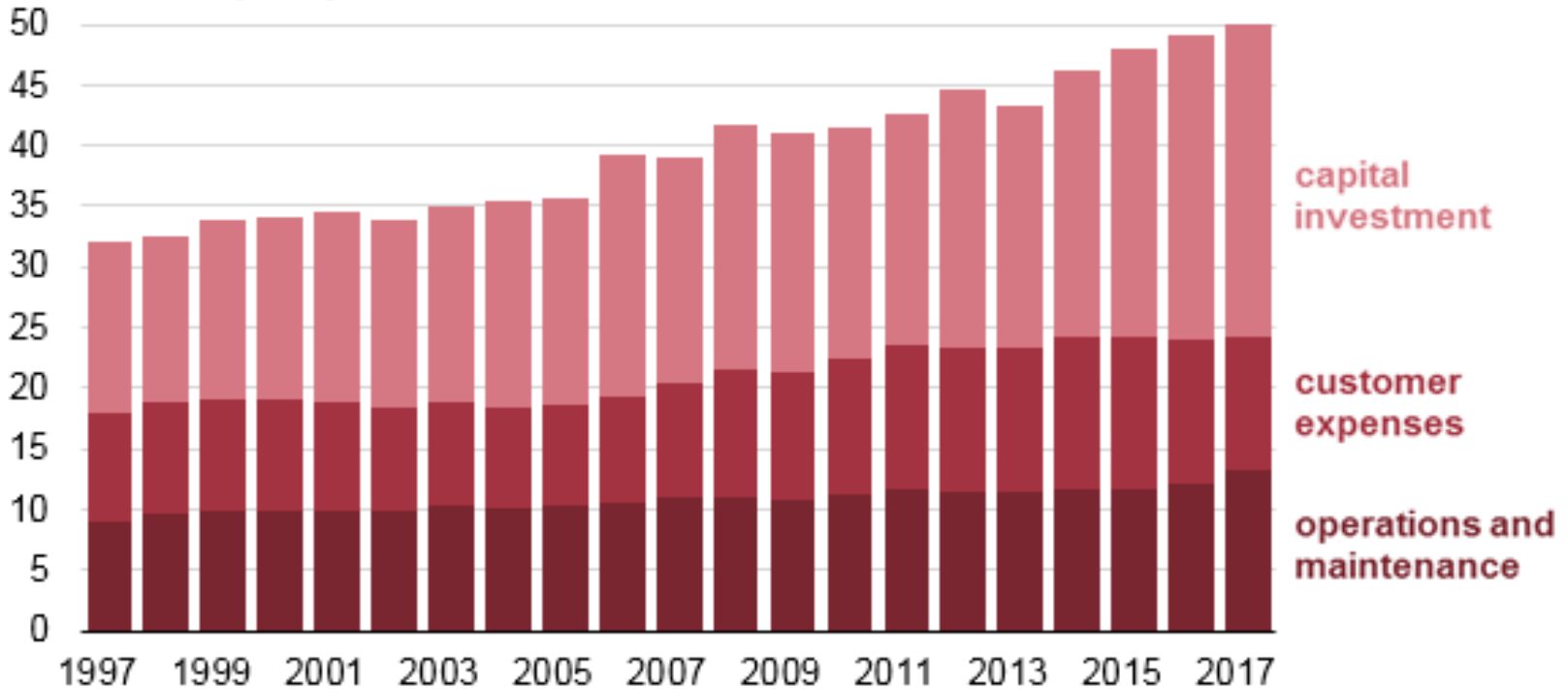
Note: Estimated pre-tax retail prices



# Distribution System Costs are Rising Steadily

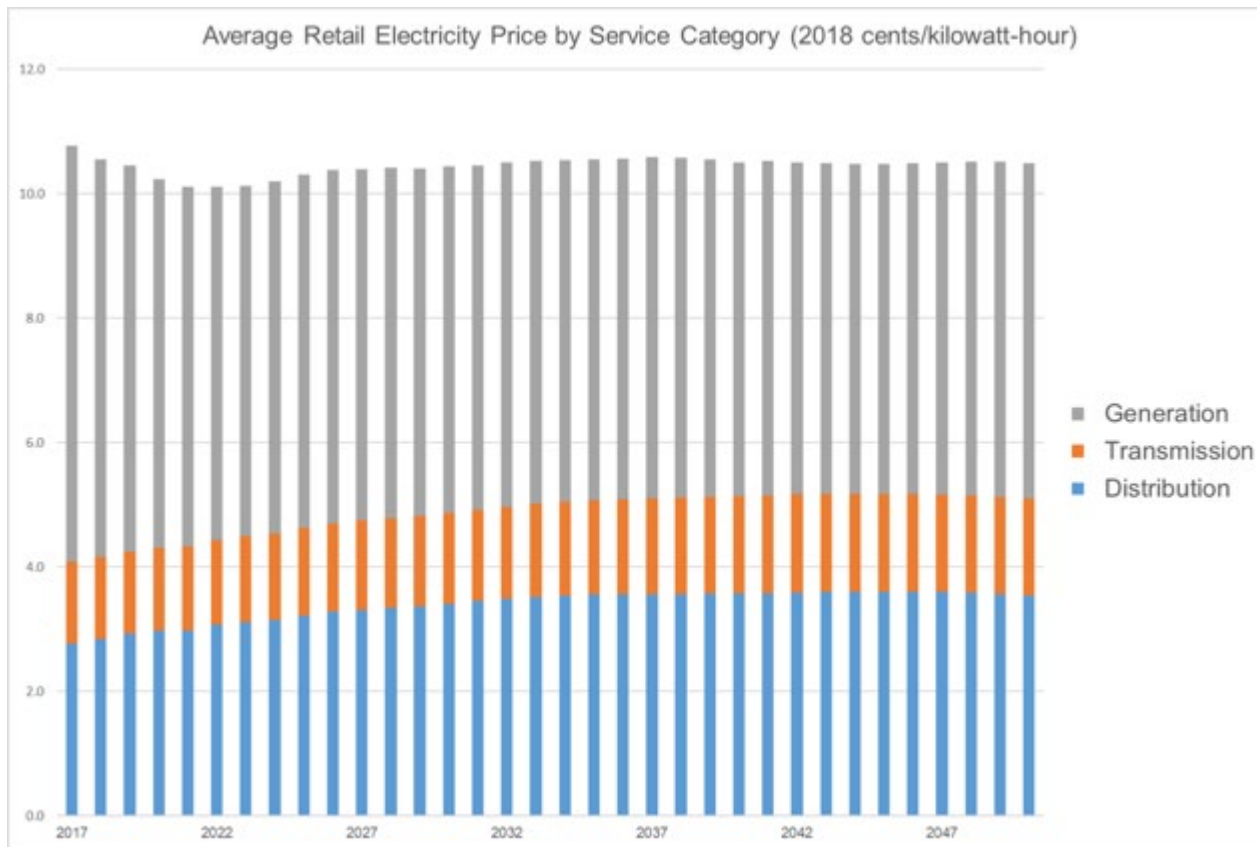


Annual electric distribution system costs for major U.S. utilities  
billion dollars (2017)



Source: U.S. Energy Information Administration (EIA), Federal Energy Regulatory Commission (FERC) Financial Reports, as accessed by Ventyx Velocity Suite

# Distribution Share of Retail Bills is Large and Projected to Grow



Data Source: EIA Annual Energy Outlook 2019

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# New Power Sector Realities

- Clean = cheap; pressure on legacy assets
- Information technology: new value and new risks
- Shrinking demand, rising peaks, and aging infrastructure
- The rise of distributed energy resources
- The rise of customer choices
- New natural and manmade threats





# 2 Challenges to Regulatory and Market Paradigms



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# Key Points

- Traditional utility regulation is under stress due to changing industry circumstances
- Existing utility incentives and market structures may be at odds with some public interest goals
- Regulatory tools exist to help address challenges

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# Shortcomings of Traditional Cost of Service/Rate of Return Regulation and Rate Design

- Capital Bias (including the “Averch-Johnson Effect”)
- Throughput Incentive
- Regulatory Lag
- Regulatory Capture
- Challenges to Markets / Market Structures

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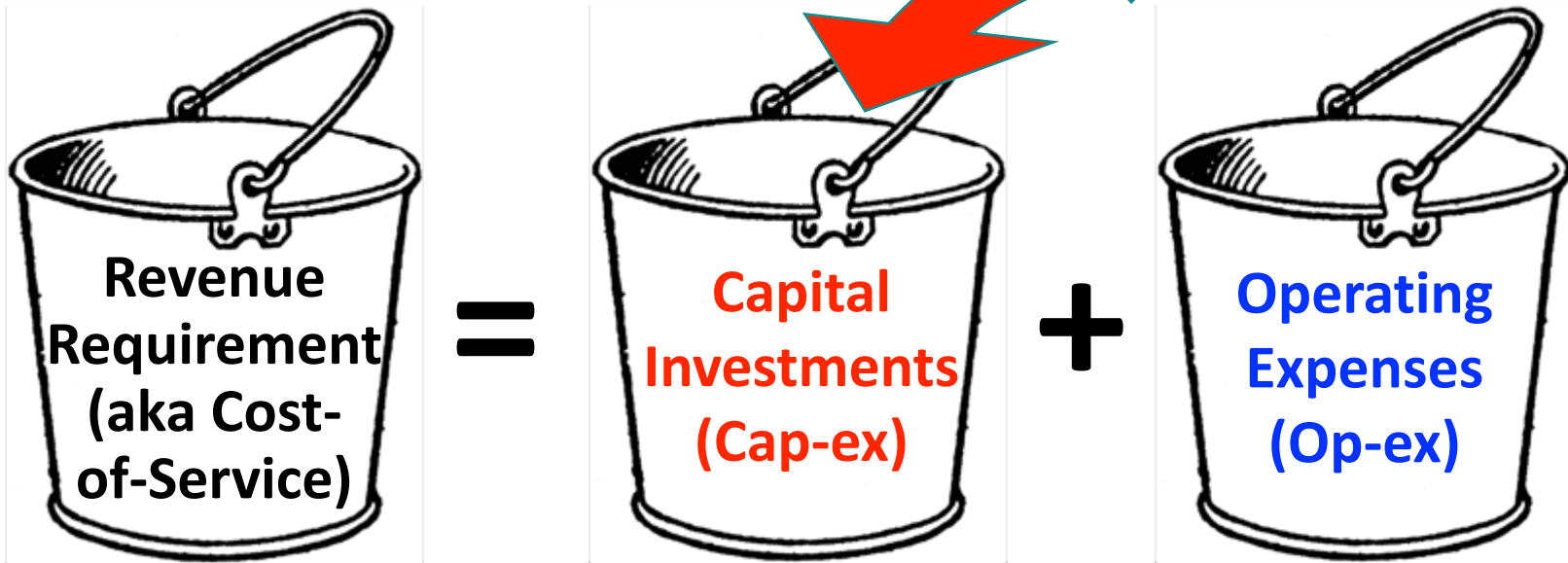
# Averch-Johnson effect

The tendency to over-invest capital to increase profit

- Results from revenue requirement calculation
- Bias for capital investments over other possible solutions
- “Gold plating”



# Utility Revenue Requirement: “The Capital Bias”



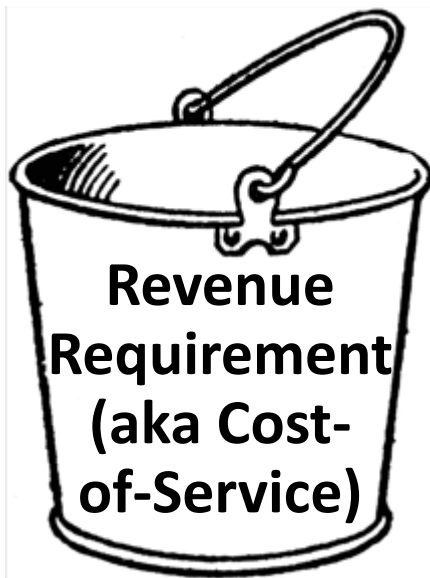
**“Rate Base” x Rate-of-Return  
(Interest on Shareholders’ “Loan”)**      **Pass-Through,  
No Rate-of-Return**

**\$1 x 10% = \$1.10**

**\$1 = \$1**



# Utility Revenue Requirement: Discourages Distributed Energy Resources



Both reduce  
kWh sales =>  
raises rates

=



Distributed Generation  
= less need  
for cap-ex =  
lower earnings

+



Energy Efficiency =  
more op-ex & less need  
for cap-ex

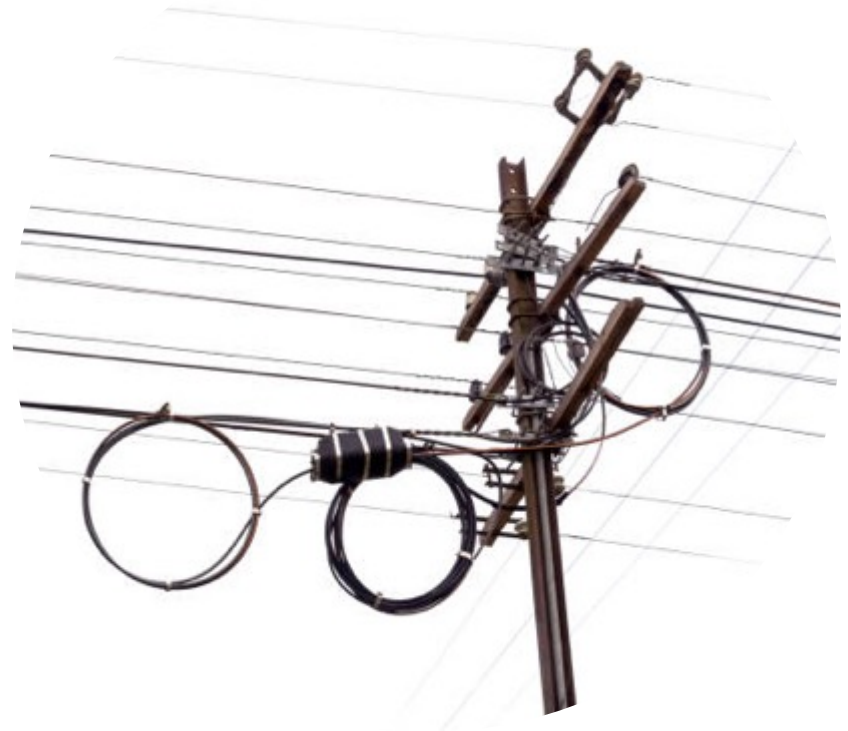


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# Throughput incentive

Increased sales lead to increased utility profit

- True when load is served with existing facilities, thus costs are fixed
- Creates incentive to resist measures that reduce sales



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# Is something wrong with the throughput incentive?

- Many reasons why utility sales might go up or down, but what should the utility motivation be?

Our current model: Sales ↑ Revenue ↑ .... Sales ↓ Revenue ↓

- Public interest appears to be in conflict with throughput incentive
  - Energy Efficiency (EE), Distributed Generation (DG), other policies reduce sales
- Also, may not be a sustainable business model in a world of flat or declining load

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# Regulatory Lag

- Time between when utility costs change and the point when customer rates change
  - Utility concern that higher costs wait until after a rate case. Earned return < allowed return
  - Some consumer advocates may favor lag to keep costs from hitting rates
  - Often means there are reconciliation mechanisms in place, which have their own issues
- In today's environment, regulatory lag may inhibit ability of utilities and commissions to respond to technological innovation and capture opportunities for customers

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# Regulatory Capture

- Elected Commissions
  - Only the utilities have a large vested interest in the outcome.
    - One approach (AZ): Campaign contribution limits
- Appointed Commissions
  - Utilities have undue influence over Governor
    - Other interests need to focus effort
- Can manifest in different ways, important to keep antennae up for utility attempts

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# Ratemaking Outside of Rate Cases: Examples of Tariff Riders

- Fuel Cost Adjustments
- Infrastructure Cost Recovery
- Energy Efficiency Programs
- Decoupling
- Performance Incentive Mechanisms
- City Fees
- State Tax

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# Tariff Riders: Fuel and Purchased Power

- Complex mechanisms, tracking a wide variety of costs
  - Fuel cost; short term purchased power, all purchased power, all power costs
- Dollar-for-dollar vs. formulaic flow-through to rates
- Criticized for removing incentive for utilities to contain fuel costs



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# Tariff Riders: Infrastructure Cost Recovery

- Older transmission & distribution (T&D) assets wear out, new ones cost more
- No new revenue to go with the new cost
- Can lead a Commission to approve a tracker for new investment in infrastructure between rate cases
- What types of infrastructure investments make sense for a rider?

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# What's wrong with infrastructure recovery mechanisms?

- Investments that rise in price flow through to rates immediately
  - E.g., grid modernization costs
- Investments and other costs that decline in price do not
  - E.g., cost reductions due to improved outage identification and prevention, lower line losses, lower billing costs, and lower peak demand
- “Single Issue Ratemaking”

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# Benefit Charges for Cost-Effective Energy Efficiency

- System Benefit Charge – dedicated funding source for cost-effective EE
- All electric consumers eligible to participate
- Utility allowed to recover all expenditures for EE
- Helps address EE market failure

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# Evolution of Wholesale Markets

## Markets in the past

- Dominated by large, inflexible central station power plants
- Few wind and solar generators
- Predictable demand
- Excessive operating reserves

## Markets in the future

- Low cost natural gas
- Near-zero energy cost of renewables
- State policy goals around clean energy
- Non-discriminatory access to markets
- Need for flexibility

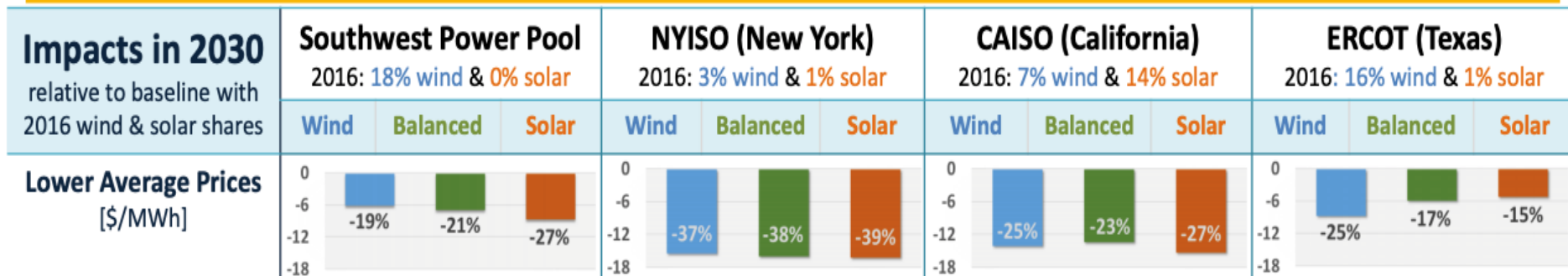
# Wholesale Price Effects of 40-50% Wind & Solar

(**Wind:** 30% wind & 10+% solar | **Balanced:** 20% wind & 20% solar | **Solar:** 30% solar & 10+% wind)

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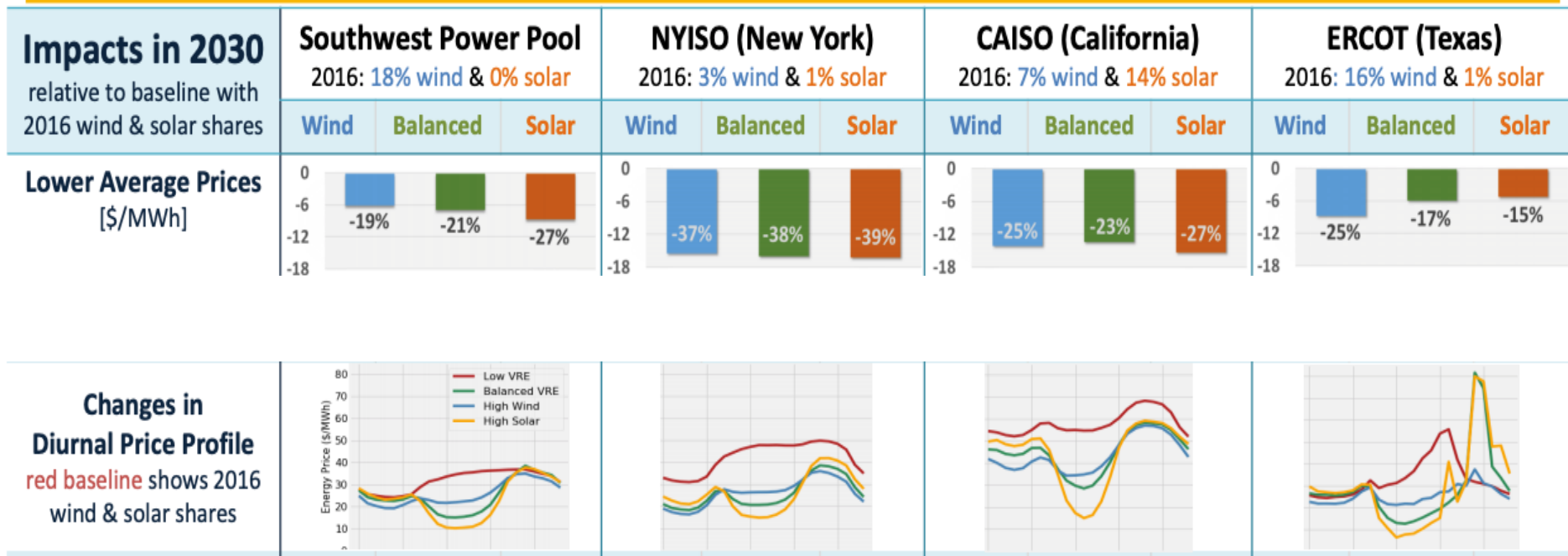
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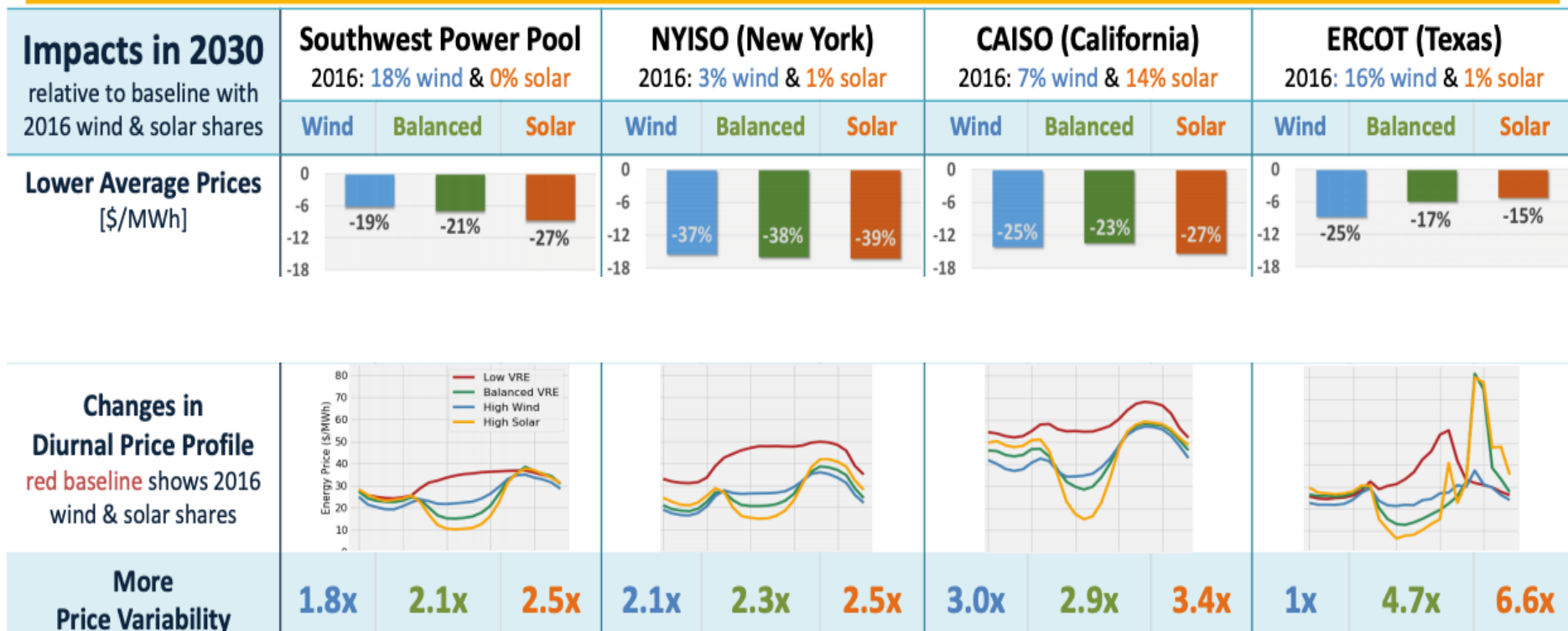
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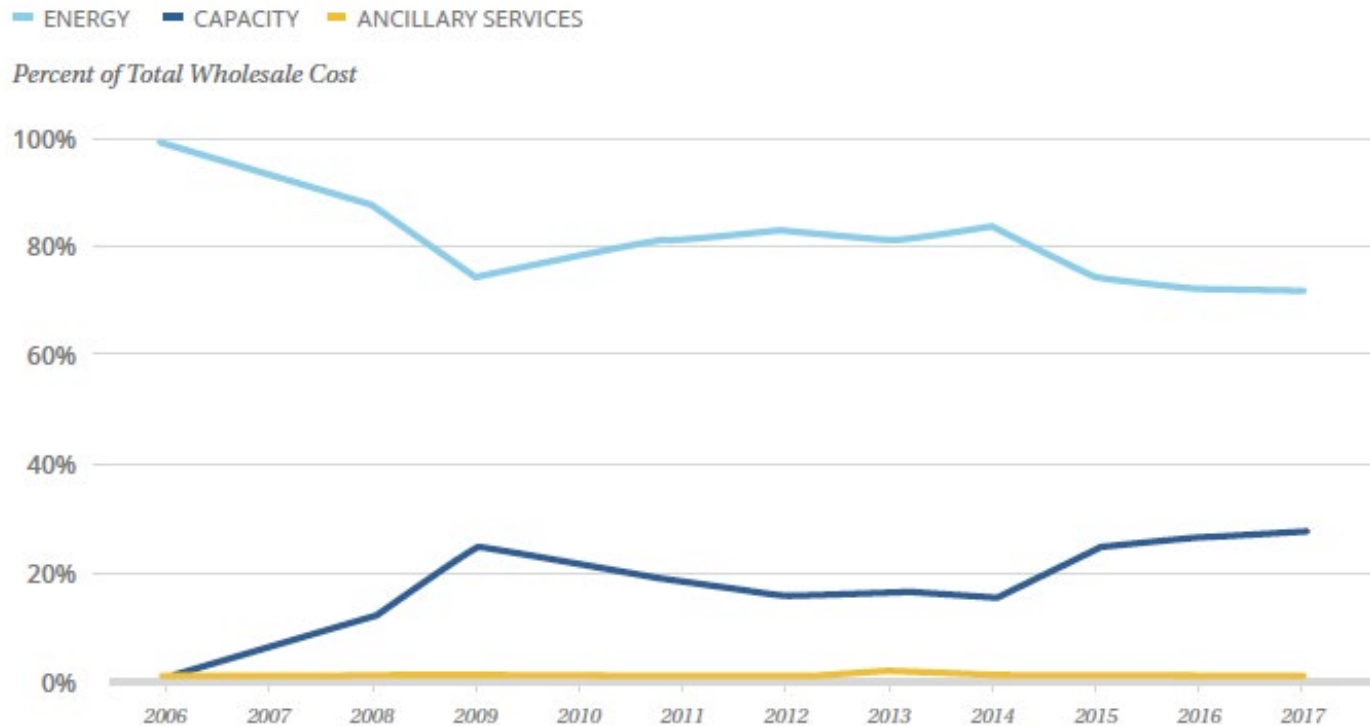
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Impacts in 2030 relative to baseline with 2016 wind & solar shares	Southwest Power Pool 2016: 18% wind & 0% solar			NYISO (New York) 2016: 3% wind & 1% solar			CAISO (California) 2016: 7% wind & 14% solar			ERCOT (Texas) 2016: 16% wind & 1% solar		
	Wind	Balanced	Solar	Wind	Balanced	Solar	Wind	Balanced	Solar	Wind	Balanced	Solar
Lower Average Prices [\$/MWh]												
Changes in Diurnal Price Profile red baseline shows 2016 wind & solar shares												
More Price Variability	1.8x	2.1x	2.5x	2.1x	2.3x	2.5x	3.0x	2.9x	3.4x	1x	4.7x	6.6x
Change in Timing of Top Net-Load Hours	Shift from 4pm to 7pm			Shift from 3pm to 5-7pm			No further shift 7pm			Shift from 3pm to 6-8pm		

# Challenges with Capacity Markets

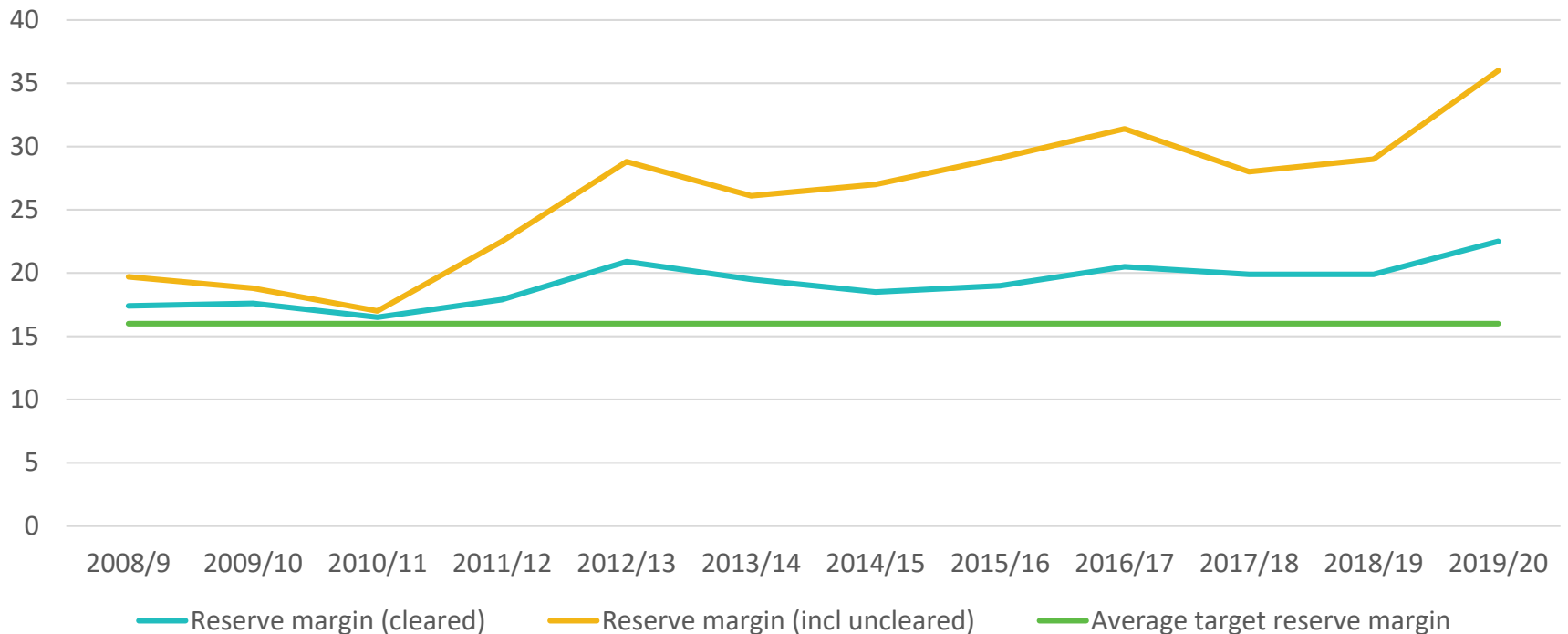
## Energy, capacity and ancillary services as shares of total PJM market revenues



Data from PJM, 2017. Image from Goggin, et al, "Customer Focused and Clean: Power Markets for the Future. Wind Solar Alliance. November 2018.

# Challenges with Capacity Markets

## PJM Reserve Margin Expansion since adoption of capacity market



Source: PJM data, compiled by J. Chen, Nicholas Institute for Environmental Policy Solutions, Duke University.

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# Preview of tools we will discuss today

- Rate design
- Resource Planning and Distribution System Planning
- Decoupling
- Performance-based Regulation
- Competition



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# Questions to Consider

- What are the most relevant trends and challenges shaping the electricity sector in South Carolina?
- How do existing regulatory structures need to adapt? What new regulatory structures are needed?
- What can regulators do to put accurate, actionable information/data about energy use into the hands of energy users?
- What opportunities does the PSC have to provide expert opinions and advice on the future of energy policy in South Carolina?
- How can the PSC harness the knowledge of stakeholders to address some of the challenges and changes?