

# **Policy Aspects of Time-Variant Pricing (TVP) of Electricity**

**Tim Brennan, UMBC and RFF**  
**brennan@umbc.edu**

**The Future of TVP in New York**  
**On the REV Agenda:**  
**The Role of Time-Variant Pricing**

**New York Department of Public Service,**  
**Environmental Defense Fund,**  
**Institute for Policy Integrity—NYU School of Law**

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## The basis for TVP

- **Primary justification for TVP: Avoiding critical peak investments in generation and transmission**
  - Top 15% of capacity in MD used < .5% of annual hours
- **Not a huge effect on total energy use**
  - Recall maybe 1%, if that
  - Less if use redistributed (washers, dryers)
- **Environmental effects small, may be negative**
  - Baseload could pollute more than peak
- **One possible advantage: Match use to renewable intermittency?**
  - Monitor “always on” appliances to match variation in wind, cloud cover

## Is there a market failure?

- Installing TVP: “Buy at \$400, sell at \$50 ...” suggest not
- Reduced blackout externality from reducing CPP use
- Implementing a baseline if using credits for reduced use
- Prices on peak too low because of regulation, socialized cost of capacity markets?
- Environmental not all that clear for reasons mentioned above
- Asymmetric information, that is, would people believe saving claims?

# Should customers be kept from buying non-TVP?

- Offer customers option for constant prices
  - Retail providers see “true” time costs in wholesale markets
  - Price will have to cover cost to of peak wholesale energy
- Retail providers (if open market) don’t internalize outage cost
- Distributors could internalize but don’t bear outage cost
  - Does decoupling attenuate incentives to worry about outages?
- Role of consumers overall
  - Do they *really* want to know all their use data?
  - Regulation as substitute for search, not markets per se?
  - Much energy policy depends on consumer “failure”

# Other regulatory speculations

- **Cost recovery**

- **Rate of return issue: Sure, if allowed return includes any risk premium regarding net value**
- **For some distribution utilities in retail, may not get (or need) cost recovery if avoided peak wholesale costs exceed costs of AMI/TVP**
- **If upfront investment needs to be expensed, face “if utilities want it, it must be bad” syndrome**

- **Decoupling**

- **In principle, distribution utility insulated from lost profits due to retail price > wholesale cost**
- **But TVP benefits utility already**
- **Could reduce opposition to additional conservation policies for demand more at peak—but is that the right policy margin?**

# REV goals and other regulatory issues

- TVP promotes demand response
- Improve energy efficiency (on peak)
  - Do prices affect use? Ahmad, Frank say yes!
  - Asymmetric information in TVP adoption
- Incentive for DG (DER) if DG works at peak periods
  - Solar panels?
- Who should provide TVP, energy management, DG?
  - Regulated utility or competitive enterprises?
  - Distribution needs pricing reform, move to fixed (telco history)
  - “N<sup>th</sup> best” environmental policy may be usage-based recovery