Engaging with PUCs, A Sister Agency

A presentation for NASEO

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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
Program Outline

• Why engage with PUCs?

• Typical PUC proceedings

• How energy offices can engage with PUCs
Why engage with PUCs?
Big Decisions
Delivering our priorities

- Kickstart: £15.8 million transformation programme savings
- Property savings of £1.6 million
- 5% reduction in energy use
- 2% lower carbon dioxide emissions
- -284 full time equivalents to 4,515 FTE
- 95% council tax collection rates
- 97% business rates
- 9.4 working days lost per FTE
- External funding of £43.8 million secured for improvements
- 30% of council's procurement is with local firms
- 16% of transactions are now online
- 12% reduction in face to face contact
- 60% parliamentary election turnout

Community Cohesion Awards

Social enterprise West Midlands
Social Innovation Partner

www.coventry.gov.uk/performance/
Why Engage with PUCs: Substantive / Programmatic Reasons

- Elements of typical SEO scope depend on PUC
- SEO experts can help PUC toward best work
- SEO Long term energy plans can be given life in PUC decisions
Why Engage with PUC: Good Government

• Connect actions of all state officials to outcomes
• Trusted advice from SEO to PUC
• Political gloss for PUC consideration
  • Keep the PUC connected
Why Energy Offices May Not Engage with PUCs

• Lack of…
  • Resources
  • Experience
  • Authority

• Political decision to keep executive distance from PUC
Typical PUC proceedings

- Rate/Revenue cases
- Investments and Siting
- Generic Policy Investigations
Emerging PUC Issues Leading to new/modified proceedings

- Resilience
- EV support equipment and charging rates
- Electrification (heating and cooling)
- Microgrid rules
- PV compensation
- Transactive energy and distributed ledgers
- Use of data by customers and others
- Performance regulation
PUC Processes
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PUC Processes

- Rules limiting conversation between the PUC and others do not govern all PUC activity
  - Outside dockets
  - Or not directly likely to become a docket
- Look for opportunity for free flow conversation
- Focus on hypotheticals
How energy offices can engage with PUCs

• Clarify Priorities
  • Helps administration to focus
  • Clarifies expectations for SEO

• Avoids mission creep
How energy offices can engage with PUCs

- Recognize Inside Game
  - Special relationship of sister agencies
    - If there is trust
    - Clarify priorities, opportunity, limitations, etc.
How energy offices can engage with PUCs

• Recognize Inside Game
  • Outside of PUC dockets/processes
    • Demonstrate “trusted advisor” capacity/intent
    • Expertise complementing new issues in new dockets
    • Principal to principal & staff to staff
    • At times conciliator, at times pushing
How energy offices can engage with PUCs

• Participate in Outside Game
  • Goals:
    • Set up PUC to succeed
    • Draw clear line from administration for PUC to consider
  • Outside of PUC dockets
    • Use SEO strengths
    • Coordinate stakeholder efforts to advance goals
How energy offices can engage with PUCs

• Participate in Outside Game
  • In the hearing room
    • Serve the process, including parties
      • Locate outside experts if needed
    • Base advocacy on SEO strengths:
      • Source of sound information
      • Interpreter of state energy policy
• Common cause on inter-state relationships
Takeaways

- SEO – PUC relationship is best if **intentional**
- **Personal** relationships at all levels are valuable
- Encourage **informal** process, allowing a freer flow of communication, most suited for innovation-based activity
About RAP

The Regulatory Assistance Project (RAP)® is an independent, non-partisan, non-governmental organization dedicated to accelerating the transition to a clean, reliable, and efficient energy future.

Learn more about our work at raponline.org

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