

NLH 41 (Re: Dr. Wilson's Report, p. 18) It is asserted that rate class contributions to those local loads are not generally measured with precision, and therefore some available proxy must be used. It is then recommended that the non-coincident peak method be used for that purpose. If rate class load research can identify the hour of the rate class non-coincident peak demand, should it not, with the same accuracy, be able to identify the rate class contribution to the coincident peak of distribution substations and primary circuits?

RESPONSE:

It may. However, since the capacity costs of these facilities are not determined by the system coincident peak, such an identification may not be very helpful to cost allocation and rate design question.