Thompson & Associates

Report of Investigation

of Electric Utility Operating Characteristics Relevant to a Restructured Market in Oklahoma

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Relevant to a Restructured Market in Oklahoma
Interim Report 1, Version 1.2

Introduction

In January,2020, Thompson And Associates received a request from the Alliance for Electric Restructuring in Oklahoma (AERO) to perform certain research activities related to the development of a market for retail sales of electricity in Oklahoma. In the context of this endeavor it was determined that the work would proceed in three phases with a report on each phase. It was agreed that the reports would address the topics described below. It was further stipulated that any proposal for competitive services advanced by AERO would: (a) focus on the two large investor owned utilities, Public Service Company of Oklahoma (PSO) and Oklahoma Gas and Electric Company (OG&E); (b) that participation by other electric suppliers would be voluntary and would be based on rules and conventions developed for PSO and OG&E and (c) that the market defined would not include residential customers. It should be noted that having a market not including Residential Consumers is somewhat unusual as most of the states having competitive electricity markets include residential consumers in the market. The research performed has focused on PSO and OGE's non-residential customer classes, although Residential sales statistics are included in the tables for the sake of perspective. Outdoor lighting services were also excluded from our analyses and were included in the statistical tables as part of the "All Other" category.

Report 1

Report 1 serves to document the following activities:

a) Defining the market proposed for competitive services. This amounts to defining the customers which would have access to competitive sources of electric power supply. The identification of such customers can be by size, rate class, or other identifiable attributes.

b) Quantifying the estimated electric load, in terms of peak condition megawatts and annual megawatt-hour usage for each rate code, usage threshold, or other identifying attribute, for consumers proposed for inclusion in the competitive market.

c) Evaluation of the current Southwest Power Pool markets for energy supply and transmission services. The intent of this evaluation is to determine the extent to which the evolution of these markets may have reduced or eliminated the prospect for significant levels of stranded costs. Such costs may be associated with the development of a competitive marketplace but are likely to be impacted by the evolution in the Southwest Power Pool Markets.

Report 2

Report 2 will address the following topics.

1. Evaluation of the impact of market restructuring on non-participating customer classes. This will involve review of the retail rate filings tendered by the subject companies and analysis of the impact electric restructuring is likely to have on the rates of such customers.
2. Estimates of consumer savings which may be available in the competitive marketplace.

Report 3

Report 3 will focus on evaluating Stranded Costs for OG&E and PSO. This will rely upon an understanding of the Southwest Power Pool power supply and transmission services markets developed in Report 1 and upon research into detailed costing information from published sources of pertinent information, such as rate case testimony and exhibits, the Annual Reports to the Federal Energy Regulatory Commission, operation of the Southwest Power Pool markets and potentially other sources of information.

Principal findings and recommendations:

1. After examination of several alternatives, we recommend a competitive market consisting of all retail customers except for those served on Residential and Outdoor Lighting rates. As shown on Tables 6A and 6B this will result in about 65 percent of retail energy sales being included in the competitive market and will cover about 180,000 customers. Our reasoning supporting this market definition appears later in the report.

2. After examining the Southwest Power Pool energy markets, we believe that while their presence may mitigate the level of stranded costs which might otherwise be associated with the development of a competitive market for electricity, we cannot conclude that no stranded costs will exist. We therefore recommend additional research into the level of expected stranded costs.

Market Definition:

Energy delivery and peak load information was obtained from a variety of sources including the Annual Report to FERC Form 1's and the most recent retail rate cases on file with the Oklahoma Corporation Commission (OCC). Because "Pro Forma"

information was considered in our analyses and in a few instances was adjusted to satisfy known constraints, all sales statistics should be interpreted as approximate values. Table 1A below shows the Annual kWh delivered, the average use per customer, the annual class contribution to the demand at the time of the system peak and the average peak demand per customer for each of the principal customer rate classes for PSO. Table 1B shows the same information for OG&E. Each of the principal customer classes shown has sub-classes to recognize differing customer conditions. For Example, the PSO Low Use General Service Class (LUGS) has the following subcategories: Low Use General Service (SL4), Low Use General Service (SL5), Low Use General Service-Grandfathered (SL5), Low Use General Service TOD (SL5), Low Use General Service Net Metering (SL5), and Optional Unmetered Service (LUGS SL5). Variants of this rate schedule are also available to public schools and are classified as a separate rate class. The term "(SL5)" refers to the delivery voltage at which this service is provided. PSO and OG&E have similar definitions for their service levels. PSO defines its service levels as follows:

1. Service Level 1 or Transmission Service is defined as "service taken directly from the transmission system (69 kV or greater) with no transformation provided by the Company."
2. Service Level 2 customers take Primary Substation Service which is defined as "service taken directly from the transmission system (69 kV or greater) with one transformation provided through a Company owned substation or transformer."
3. Service Level 3 customers take Primary Service which is defined as: "1) service taken from a primary distribution line (34 kV or lower) with only one transformation provided by the Company from the transmission system (69kV or higher); or, 2) service taken from a primary distribution line at 2.4 kV to 34 kV with more than one transformation provided by the Company from the transmission system."
4. Service Level 4 customers take service below 2.4 kV with a second transformation provided by the Company. A significant portion of the customer electric loads on Service Level 4 are believed to be those of underground network customers in metropolitan areas such as Tulsa and Oklahoma City.

5. Service Level 5 customers take service at secondary voltages of less than 2,000 volts, usually 120/240 volts.

Market Share Basis 1:

Our first analyses of the market considered the rate classes shown on Tables 1A and 1B. Tables 2A and 2B show the percentage of the Utilities' kwh sales which would be included in a competitive market if the largest customer classes (in terms of kwh per customer) were included in a competitive market. This is done by depicting the percentage each class represents of the company's total retail deliveries and aggregating the percentages of total beginning with the largest usage class, then adding the next largest and so on. For example, if the "Large Power and Light" and the "Power and Light" rate classes only were included in a competitive market, this would result in approximately 43 percent, and 55 percent of kwh sold being part of the competitive market for PSO and OG&E respectively. The contribution of each rate class to system peak demands and the number of customers in each rate class are also shown. The sales statistics appearing in Tables 1A through 6B were taken from the last rate case filed at the OCC by each of the utilities and represent "Pro Forma" sales which have been adjusted to reflect year end known and, in some cases, anticipated changes. "Pro Forma" sales are used in a rate case is to give a more accurate estimate of the future than actual sales and they were used in this analysis for the same reason.

Market Share Basis 2:

Our second analysis of market share is depicted on Tables 3A and 3B. It is based on kwh sales at the various service levels discussed previously and follows the same convention as the first analysis. If, for example, all sales in this analysis except those at service level 5 were made part of a competitive market, it would result in approximately 36 percent and 32 percent of the kwh sold being included in the competitive market for PSO and OG&E respectively. The previous remarks

regarding use of “Pro Forma” sales quantities and the information on peak demands and numbers of customers apply to each of our analyses.

Market Share Basis 3:

Our third analysis is a combination of the first two as it identifies customers both by rate class and service level. Table 4A shows the Annual kWh deliveries for the class and on a “per Customer” basis, and the Maximum Demands at the time of the system peak demand associated with each class and, on a “per customer” basis for PSO. The information is shown for each principal class for each service level. Table 4B shows similar information for OG&E. As discussed previously, each of the customer classes shown has sub-classes to recognize differing customer conditions. The data in these tables has been sorted by decreasing annual kWh per customer. The sales information contained in Tables 4A and 4B was transferred to Tables 5A and 5B respectively. This information was then expressed as percentages and cumulative percentages of total kWh sold. If all of the larger businesses and schools were included as depicted by the shaded bands on Tables 5A and 5B, it would result in about 58 percent for PSO and 57 percent of total kwh sales for OG&E being included in the competitive market.

Market Share Basis 4:

The fourth and final market definition considered amounted to placing all retail sales other than those on residential and outdoor lighting tariffs in the competitive market. The impact of doing so is illustrated on Table 6A for PSO and on Table 6B for OG&E. Tables 6A and 6B were constructed by aggregating all of the services shown previously on Tables 5A and 5B into a single group representing the competitive market. As a review of these tables will demonstrate, this market definition results in about 64 percent of PSO’s retail kwh sales and about 65 percent of OG&E’s retail kwh sales comprising the competitive market.

Choosing a Market Definition:

Two questions must be addressed when defining a competitive market for electricity. First, what is the appropriate measure to use in defining the market; and second, what is the most appropriate threshold value to qualify for market inclusion? There are multiple ways to define a market for competitive services. In addition to the four measures displayed in Tables 2A, 2B,3A,3B,5A, 5B, 6A, and 6B, other methods exist. One additional method would be to make customers eligible for the competitive market based on the customer's maximum demand, in kW. For example, the market could be defined as all customers having a maximum demand of 500 kW or more. In this instance, 500 kW would be the entrance threshold. Likewise, the market could be defined by the annual kWh usage. An example of this would be a market composed of all customers using more than a million kWh annually. Using either of these market measures requires individual customer statistics that are generally not available and often not maintained by the utilities. Using the class average demands (which are shown on Tables 1A and 1B, and in more detail on Tables 4A and 4B) or annual kwh usage which is shown on the same tables may be a useful surrogate for defining the competitive class by the aggregate characteristics of customers within rate classes. However, using the aggregate characteristics of the rate class as an indicator of the demand or usage of individual customers in the rate class will not yield a reliable indicator of the size of individual customers composing the rate class or the number of customers exceeding any size threshold. In other words, if the average annual usage for a hypothetical rate class were 1 million kwh annually, we would find that including only customers in a rate class which had average usage of at least 1 million kwh annually would result in fewer kWh in the competitive class than if the whole rate class is included. Without specific information regarding the size distribution of customers within the class, the kWh contribution of the customers in that rate class to a competitive market defined by the size of individual customers is impossible to know. This means that while we can specify a competitive market as "All Customers using more than X kWh annually", we cannot really know how big that market is without having information that is not publicly available. We do know,

however, the annual kwh sold and the number of customers within each rate code and have a very good estimate of the peak demands associated with such customers. We also know with some certainty the sales quantities associated with each service level.

Our recommended market definition:

We initially believed that defining a competitive market based on service levels would offer several advantages and suffer fewer disadvantages compared to using methods based on customers' size, rate class average customer size, or any obvious combinations of the two. Service levels are clearly defined and unlikely to be revised by the utilities and the levels are essentially permanent and would not change over time. However, a competitive market composed of only customers served on Service Levels 1 through 4 would result in only 36 percent of PSO's energy sales and 32 percent of OG&E's energy sales being included in the competitive market. The resulting market would consist of only about 1,800 customers. It is questionable whether a market with this relatively small number of customers would be robust enough to attract the degree of competition needed to bring about real improvements in economic efficiency or significant economic development.

Therefore, we considered another option that retains most of the advantages of a service level distinction but increases the opportunities for the development of a robust market. After reviewing the opportunities offered by other market definitions, it is apparent that there are substantial advantages of a market definition that includes all non-residential rate classes (excepting outdoor lighting). Some of those advantages are:

1. The residential market is a recognized and well-defined rate classification and it is unlikely that utilities could influence the size of the market by "tariff gerrymandering", or restructuring, renaming, or otherwise modifying their tariff structures to influence the size of the market.

2. Having a market defined as including all non-residential customers (except Outdoor Lighting) results in similar impacts on the two utilities which will compose the bulk of the Oklahoma market.

3. Adequate metering is likely to exist for most non-residential customers.

4. A market containing all non-residential rate classes except outdoor lighting would open about 65% of current retail sales to retail competition and thus would provide a larger, more robust market than a market based on service levels. This offers the opportunity for significant competition and numerous sub-markets or "niches" to appeal to a variety of marketers.

We therefore believe that a greater opportunity will exist for market innovation and economic development using the more expansive market defined by including all non-residential customer classes. Based on these considerations, our recommendation is to adopt a competitive market definition comprised of all customer classes except residential and outdoor lighting.

Stranded Costs and the Southwest Power Pool Energy Markets:

The development of competitive electricity markets sometimes results in stranded costs. Stranded Costs are costs that a utility has incurred and that the utility does not have a reasonable opportunity to recover because of the introduction of competition or some other unanticipated occurrence such as new environmental regulations or other conditions that may serve to render a generating or other facility economically inoperable. Stranded costs can be calculated as the difference between unrecovered investment and the present value of expected operating earnings from those sunk assets (if any). Thus, stranded costs represent lost revenues or reductions in asset values experienced by a regulated firm when new policies or other changed conditions alter the ability to recover costs on an asset which would otherwise be recoverable in rates. In order to evaluate this issue, a variety of sources were

examined including State and Federal rate filings, the annual reports filed at the Federal Energy Regulatory Commission (FERC), provisions in the Southwest Power Pool Open Access Transmission Tariff, and testimony filed in the last retail rate cases filed by PSO and OG&E.

In 2014, the Southwest Power Pool (SPP) implemented a new market structure which included provisions that served to substantially alter the manner in which power generation facilities are dispatched and the pricing of energy. Our understanding is that SPP now dispatches all of the generation resources in its control area and operates Day Ahead and Real Time Balancing energy markets. As a general proposition, all generation facilities connected to the grid within the SPP control area are dispatched by SPP. This means that at any given time the operation of a utility's generation facilities may be influenced by a number of factors other than the retail loads of that utility. Given this circumstance, it is somewhat unclear what impact the loss of retail sales might have on the prospect for stranded costs occurring as a consequence of electric restructuring. This is particularly true if the electricity delivered to each customer is unchanged and merely being supplied into the grid by a different party.

It is likely that the SPP market structure will influence, perhaps mitigate, the prospect for stranded costs but we are unable to conclude that no stranded costs will occur if a competitive market emerges. Our somewhat limited understanding of market operations would suggest that any loss of load might not impact the viability of the most efficient generation units but might have some impact on less efficient units. Based on our preliminary review, we believe that this issue deserves additional research and recommend that the research for Report number 3 be conducted.

Table 1-A				
PSO Energy and Demand by Rate Class				
Customer Class	Energy Deliveries		Peak Demands	
	kWh	kWh per	At System Peak	
	for Class	Customer	for Class	kW per
	(Millions)	(X 1,000)	(kW X 1,000)	Customer
Large Power and Light	6,351	11,691	973	1,869
Power and Light	1,283	4,574	242	821
Primary Non Demand	20	522	4	116
General Service Schools	249	347	96	144
General Service	2,409	278	624	69
Municipal Pumping	11	138	2	26
Low Use General Service Scl	33	23	10	7
Low Use General Service	1,030	17	237	4
Residential	6,202	13	1,885	4
All Others	148			
Total Retail	17,736			

Table 1-B				
OG&E Energy and Demand by Rate Class				
Customer Class	Energy Deliveries		Peak Demands	
	kWh	kWh per	At System Peak	
	for Class	Customer	for Class	kW per
	(Millions)	(X 1,000)	(kW X 1,000)	Customer
Large Power and Light	6,456	71,595	1,296	15,558
Power and Light	6,675	1,082	1,138	184
Schools Large	194	517	29	83
Municipal Pumping	127	93	16	12
Schools Small	214	88	36	15
Oil & Gas	260	60	33	7
General Service	1,509	18	353	4
Residential	8,064	12	2,528	4
All Others	237			
Total Oklahoma Retail	23,736			

Table 2-A PSO Market Share Analysis 1						
Customer Class	Energy Deliveries			Peak	Customers	
	kWh for Class (Millions)	Percent of Total Retail	Cumulative Percentage	Demand (kW X 1,000)	Number of Customers	Cum No Customers
Large Power and Light	6,351	36%	36%	973	537	537
Power and Light	1,283	7%	43%	242	1,500	2,037
Primary Non Demand	20	0%	43%	4	39	2,076
General Service Schools	249	1%	45%	96	717	2,793
General Service	2,409	14%	58%	624	8,493	11,286
Municipal Pumping	11	0%	58%	2	79	11,365
Low Use General Service Schools	33	0%	58%	10	1,412	12,777
Low Use General Service	1,030	6%	64%	237	59,560	72,337
Residential	6,202	35%	99%	1,885	475,922	548,259
All Others	148	1%	100%		2,147	550,406
Total Retail	17,736				550,406	

Table 2-B OG&E Market Share Analysis 1						
Customer Class	Energy Deliveries			Peak	Customers	
	kWh for Class (Millions)	Percent of Total Retail	Cumulative Percentage	Demand (kW X 1,000)	Number of Customers	Cum No Customers
Large Power and Light	6,456	27%	27%	1,296	120	120
Power and Light	6,675	28%	55%	1,138	16,268	16,388
Schools Large	194	1%	56%	29	349	16,737
Municipal Pumping	127	1%	57%	16	1,359	18,096
Schools Small	214	1%	58%	36	2,415	20,511
Oil & Gas	260	1%	59%	33	4,847	25,359
General Service	1,509	6%	65%	353	85,755	111,114
Residential	8,064	34%	99%	2,528	671,861	782,975
All Others	237	1%	100%		264	783,239
Total Oklahoma Retail	23,736				783,239	

Table 3-A
PSO Market Share Analysis 2

Customer Class	Energy Deliveries			Peak	Customers	
	kWh for Class (Millions)	Percent of Total Retail	Cumulative Percentage	Demand (kW X 1,000)	Number of Customers	Cum No Customers
Level 1	955	5%	5%	122	31	31
Level 2	2,999	17%	22%	506	54	85
Level 3	2,345	13%	36%	349	491	576
Level 4	135	1%	36%	21	296	872
Level 5	11,155	63%	99%	3,043	550,124	550,996
Total Retail	17,736					

Table 3-B

OG&E Market Share Analysis 2

Customer Class	Energy Deliveries			Peak	Customers	
	kWh for Class (Millions)	Percent of Total Retail	Cumulative Percentage	Demand (kW X 1,000)	Number of Customers	Cum No Customers
Level 1	781	3%	3%	92	18	18
Level 2	4,523	19%	22%	1,047	82	100
Level 3	1,698	7%	29%	210	461	561
Level 4	704	3%	32%	89	361	922
Level 5	15,808	67%	99%	3,992	782,053	782,975
Total Oklahoma Retail	23,736					

Table 4-A PSO Energy and Demand by Rate Class and Voltage Level				
Customer Class	Energy Deliveries		Peak Demands	
	kWh for Class (Millions)	kWh per Customer (X 1,000)	At System Peak for Class (kW X 1,000)	kW per Customer
Large Power and Light S/L 2	2,999	55,537	506,122	9,603
Large Power and Light S/L 1	955	30,808	122,445	4,021
Large Power and Light S/L 3	2,324	5,142	344,467	762
Power and Light S/L 4	73	4,574	12,238	821
General Service S/L 4	58	1,524	7,805	221
Power and Light S/L 5	1,283	865	229,513	155
Primary Non Demand S/L 3	20	522	4,314	116
General Service Schools S/L 5	249	347	96,208	144
General Service S/L 5	2,351	278	581,220	69
Municipal Pumping S/L 5	11	138	2,023	26
Low Use General Service Schools S/L 5	33	23	9,654	7
Low Use General Service S/L 5	1,026	17	237,009	4
Low Use General Service S/L 4	4	16	822	4
Residential S/L 5	6,202	13	1,885,467	4
All Others	148			
Total Retail	17,736			

Table 4-B OG&E Energy and Demand by Rate Class and Service Level				
Customer Class	Energy Deliveries		Peak Demands	
	kWh for Class (Millions)	kWh per Customer (X 1,000)	At System Peak for Class (kW X 1,000)	kW per Customer
LPL S/L 2	3,589	239,298	1,024	18,067
LPL S/L 1	1,483	114,080	92	7,513
LPL S/L 4	251	35,836	32,872	4,696
LPL S/L 3	775	25,818	100,687	3,356
LPL S/L 5	358	22,392	47,853	2,991
PL S/L 2	205	8,530	22,361	902
PL S/L 1	27	4,434	1,807	284
PL S/L 4	324	3,684	42,294	486
PL S/L 3	908	2,854	106,076	333
Schools - Lge S/L 4	14	1,277	1,795	163
Schools - Lge S/L 3	7	1,057	1,279	182
PL S/L 5	5,212	909	965,837	169
Schools - Lge S/L 5	159	480	25,918	78
Oil & Gas S/L 4	112	478	11,499	49
GS S/L 4	3	403	680	79
GS S/L 3	8	246	2,048	50
GS S/L 2	1	175	133	42
MP S/L 5	127	93	17,323	12
Schools - Sm S/L 5	214	88	39,586	15
GS S/L 5	1,497	78	380,369	15
Oil & Gas S/L 5	177	38	23,599	5
Residential S/L 5	8,064	12	2,745,109	4
All Others	221			
Total Oklahoma Retail	23,736			

Table 5-A
PSO Market Share Analysis 3

Customer Class	Energy Deliveries			Peak Demand	Customers	
	kWh for Class (Millions)	Percent of Total Retail	Cumulative Percentage	for Class (kW X 1,000)	Number of Customers	Cum No Customers
Large Power and Light S/L 2	2,999	17%	17%	506,122	54	54
Large Power and Light S/L 1	955	5%	22%	122,445	31	85
Large Power and Light S/L 3	2,324	13%	35%	344,467	452	537
Power and Light S/L 4	73	0%	36%	12,238	16	553
General Service S/L 4	58	0%	36%	7,805	38	591
Power and Light S/L 5	1,283	7%	43%	229,513	1,484	2,075
Primary Non Demand S/L 3	20	0%	43%	4,314	39	2,114
General Service Schools S/L 5	249	1%	45%	96,208	717	2,831
General Service S/L 5	2,351	13%	58%	581,220	8,455	11,286
Municipal Pumping S/L 5	11	0%	58%	2,023	79	11,365
Low Use General Service Schools S/L 5	33	0%	58%	9,654	1,412	12,777
Low Use General Service S/L 5	1,026	6%	64%	237,009	59,560	72,337
Low Use General Service S/L 4	4	0%	64%	822	882	73,219
Residential S/L 5	6,202	35%	99%	1,885,467	475,922	549,141
All Others	148	1%	100%		2,495	551,636
Total Retail	17,736				551,636	

Table 5-B
OG&E Market Share Analysis 3

Customer Class	Energy Deliveries			Peak Demand	Customers	
	kWh for Class (Millions)	Percent of Total Retail	Cumulative Percentage	for Class (kW X 1,000)	Number of Customers	Cum No Customers
LPL S/L 2	4,318	15%	15%	1,024	55	55
LPL S/L 1	754	6%	21%	92	12	67
LPL S/L 4	251	1%	22%	32,872	7	74
LPL S/L 3	775	3%	26%	100,687	30	104
LPL S/L 5	358	2%	27%	47,853	16	120
PL S/L 2	205	1%	28%	22,361	24	144
PL S/L 1	27	0%	28%	1,807	6	150
PL S/L 4	324	1%	30%	42,294	89	239
PL S/L 3	908	4%	33%	106,076	351	590
Schools - Lge S/L 4	14	0%	33%	1,795	11	601
Schools - Lge S/L 3	7	0%	33%	1,279	7	608
PL S/L 5	5,212	22%	55%	965,837	15,798	16,406
Schools - Lge S/L 5	159	1%	56%	25,918	331	16,737
Oil & Gas S/L 4	112	0%	57%	11,499	235	16,972
GS S/L 4	3	0%	57%	680	19	16,991
GS S/L 3	8	0%	57%	2,048	73	17,064
GS S/L 2	1	0%	57%	133	3	17,067
MP S/L 5	127	1%	57%	17,323	1,359	18,426
Schools - Sm S/L 5	214	1%	58%	39,586	2,415	20,841
GS S/L 5	1,497	6%	64%	380,369	85,661	106,502
Oil & Gas S/L 5	177	1%	65%	23,599	4,612	111,114
Residential S/L 5	8,064	34%	99%	2,745,109	671,861	782,975
All others	221	1%	100%		264	783,239
Total Oklahoma Retail	23,736				783,239	

Table 6-A
PSO Market Share Analysis 4

Customer Class	Energy Deliveries			Peak Demand	Customers	
	kWh for Class (Millions)	Percent of Total Retail	Cumulative Percentage	for Class (kW X 1,000)	Number of Customers	Cum No Customers
Competitive Market	11,386	64%	64%	2,154	72,337	72,337
Residential	6,202	35%	99%	1,885	475,922	548,259
All Others	148	1%	100%		2,147	550,406
Total Retail	17,736				550,406	

Table 6-B OG&E Market Share Analysis 4						
Customer Class	Energy Deliveries			Peak Demand	Customers	
	kWh for Class (Millions)	Percent of Total Retail	Cumulative Percentage	for Class (kW X 1,000)	Number of Customers	Cum No Customers
Competitive Market	15,435	65%	65%	1,825	111,114	111,114
Residential	8,064	34%	99%	2,745	671,861	782,975
All Others	237	1%	100%		264	783,239
Total Oklahoma Retail	23,736				783,239	

[End]