

## Public Comments on the Residential Time of Day Rate Proposal

**Name:**

Bob Mann

**Comment:**

Bob Mann, LIPA customer

Two comments:

1./ With regard to the TOD Rate proposal, this could be attractive to those who overnight charge an EV, or those who work outside of an otherwise dark and unheated/uncooled home all day, returning in the evening, near 7 PM.

TOD would not be attractive for those who work at home offices, or have people at home all day, including the many retired, who will see all-day heating/cooling and afternoon/evening use as necessary, thus making TOD rates an uneconomic impossibility, or drive higher electrical costs with TOD rate parsing, offering no benefit over the 180 (general) or 580 (electrical heating) rate.

2./ With regard to NYSERDA/LIPA/PSEGLI energy savings initiatives, including promotion of rebates for electric inverter heat pump acquisition, installation and heating, the utility should proactively initiate a rate change from 180 to 580, or require the account opt-out of the change to 580, simultaneous with the utility's notification of approved, rebated, electrical inverter heat pump heating equipment installation and being placed into operation, driving up electrical kWh consumption.

For example, we installed two, new, external cold duty inverter heat pumps with seven internal air handlers into service in early September 2021. PSEGLI actually paid modest rebates on this equipment when installed in 2021. Yet, after observing higher electrical consumption that dwarfed the magnitude of the rebates, it required us to ask why we were still being billed at the 180 general rate a year later.

Given the approved, rebated, installation into service was in 2021, a re-rating to 580 electrical heating should also have been effective in 2021, a year earlier than PSEGLI is now willing to consider, after more than \$2000 in added electricity costs.

Again, why would the 2021 installation and concurrent 2021-rebate approval and placement into service triggering measurably higher kWh consumption not have triggered the re-rating?

In discussions, PSEGLI refused to address the core issue, which is when they promote the use of electrical heating, then issue a rebate for installation and placement into service of the electrical heating equipment as of a date verified by its own inspector, why don't they simultaneously automatically change or offer to change the account from a 180 general to a

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580 electrical heating rate? As it is, the account is required to request the change after experiencing the much higher costs of electrical heating, of which PSEGLI itself is aware. This is little but a shameful pump and dump on the part of the utility.

Suggestion: initiate the rate change from 180 to 580, or require the account opt-out of the change to 580, with notification of approved, rebated, electrical heating equipment installation.

Thank you for your consideration.