

- 1 **Q:** (Reference May 3, 2019 report by Brattle Group, Inc entitled *Embedded and*
2 *Marginal Cost of Service Review*) On page 51 (lines 3 to 4) it is stated “*We are*
3 *not recommending that energy-weighting factors be used for allocating demand*
4 *costs*”, Why not? For example, why not use an energy allocator over the four
5 winter peak months?
6
- 7 A. Energy is not the source of cost causation for demand-related costs.