Rulemaking 22-07-005, Order Instituting Rulemaking to Advance Demand Flexibility Through Electric Rates
Track B, Working Group 2

CALIFORNIA COMMUNITY CHOICE ASSOCIATION Scoping Memo Question 4.b. Proposal and Conditional Response to Investor-Owned Utility Proposals

I. OVERVIEW

The following provides California Community Choice Association's (CalCCA's) proposal for the Working Group (WG) 2 report in response to the Scoping Ruling's Track B, Question 4.b. in the Demand Flexibility proceeding, Rulemaking (R.) 22-07-005.[1] Track B, Question 4 addresses the systems and processes necessary to enable dynamic pricing (i.e., real-time pricing or (RTP)):

> How should the [California Public Utilities] Commission ensure access to dynamic electricity prices by bundled and unbundled customers, devices, distributed energy resources, and third-party service providers? What systems and processes should the Commission authorize for access to prices and responding to price signals?[2]

Subsection 4.b. further defines the question with respect to entities serving unbundled customers such as community choice aggregators (CCAs):

> What systems and processes should the Commission authorize to enable load serving entities to offer unbundled customers the option to take service on dynamic electricity prices?

During the WG2 process, CalCCA presented the barriers known at this time, as well as potential solutions, for CCAs to offer dynamic pricing. Several meetings were held between the CCAs, Energy Division, and the investor-owned utilities (IOUs) (Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E)) regarding the identified barriers.[3] The IOUs also presented solutions when possible both in response to the CCAs and to requests by Energy Division. It is CalCCA's understanding that the Joint IOUs are currently seeking management approval for the solutions previously presented to Energy Division and the CCAs, and that their management approved proposals will be submitted concurrently with CalCCA's proposal. Therefore, while CalCCA identifies the barriers and needs below along with its characterization of the IOU proposals in

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1 R.22-07-005, *Assigned Commissioner's Phase 1 Scoping Memo and Ruling* (Nov. 2, 2022), at 5.

2 *Id*.

3 The CCAs and IOUs discussed the barriers in several WG 2 meetings, including meetings on March 24, 2023, and June 30, 2023. The CCAs also had meetings with PG&E and Energy Division on April 20, 2023, May 11, 2023, and July 18, 2023. A meeting between the CCAs, Energy Division, and SCE was held on April 18, 2023. A meeting between the CCAs, Energy Division, and SDG&E was held on May 4, 2023.

response to Question 4.b., CalCCA reserves the right to comment further on the IOU management approval final proposals. CalCCA also reserves the right to respond further during the Demand Flexibility proceeding as additional barriers for CCAs offering dynamic pricing may be identified. As noted above, CalCCA has presented known barriers based on the dynamic offerings currently planned for near-term implementation – largely, day-ahead hourly rates. However, additional barriers are likely to arise if load-service entities (LSEs) intend to offer other options such as dynamic rates with different temporal or geographic granularity, and subscription and transactive rates. The California Public Utilities Commission (Commission) should ensure there is a process to address additional barriers as they arise to ensure both bundled and unbundled customers are fully able to participate in demand flexibility rates.

The following CalCCA proposal is organized by the barriers identified for CCAs to offer dynamic pricing in each IOU service territory. Within each IOU section below, CalCCA presents the following:

- Barriers/needs known at this time for CCAs in the IOU service territory to offer dynamic pricing;
- CalCCA's understanding of IOU proposals to resolve the barriers; and
- CalCCA's response to its understanding of the IOU proposals.

II. CCA DYNAMIC PRICING BARRIERS IN PG&E SERVICE TERRITORY

A. Barrier #1: Billing Usage Data Not Provided at Hourly or Sub-Hourly Interval

CCAs in PG&E's service territory do not currently receive billing quality usage data at the hourly (or sub-hourly) interval. PG&E's billing transactions – the only reliable source of billing quality usage data – are presently aggregated down to PG&E's own pre-defined time-of-use (TOU) periods. These data are provided at the end of each billing period. For example, a billing transaction will specify usage during "peak" and "off peak" only. For CCAs to bill customers on hourly (or sub-hourly) dynamic/RTP rates, or any other rates that differ from PG&E's defined TOU periods, CCAs must have access to billing quality hourly (or sub-hourly) interval usage data.[4]

1. PG&E's Response and Draft Proposal

PG&E states that its Energy Data Interface (EDI) data transfer system can only currently support billing quality hourly interval data for a limited number of electric service points. PG&E is currently upgrading its billing system to allow it to support billing quality hourly interval data for all service address IDs (SAIDs), including those of CCA customers. The billing system upgrade will be complete in approximately July, 2026.

To overcome this barrier in the meantime, PG&E plans to upgrade its EDI system to support billing quality hourly interval data for up to 600,000 unbundled SAIDs by December

[4] While the need for hourly interval data was discussed during the CalCCA/PG&E/Energy Division meetings, the CCAs should have access to sub-hourly data (i.e., 15-minute or other sub-hourly intervals) if the IOUs have access to such data to provide sub-hourly dynamic pricing.

2023, in preparation for PG&E's upcoming Day Ahead Hourly Real Time Pricing (DAHRTP) pilot and the new Net Billing Tariff (NBT) rates. Of the 600,000 SAIDs, PG&E expects 3,000-5,000 SAIDS to be taken up for the DAHRTP pilots within CCA territories. For the net billing tariff, PG&E expects between 214,500 and 312,000 SAIDs will be on the new rate by mid-2026, when the new billing system goes live. The near-term capacity upgrade to 600,000 SAIDs is part of the implementation authorized in D.22-08-002 for PG&E's real-time pricing pilot.[5]

2. CalCCA Response

CalCCA appreciates PG&E's proposal to accommodate the needs of CCAs for billing quality hourly interval usage data during the period prior to its full billing system upgrade. CalCCA's understanding of PG&E's proposal is to increase the number of SAIDs providing the hourly interval usage data if the DAHRTP and NBT rates, along with the CCA additional needs, exceed PG&E's planned 600,000 SAIDs prior to the July 2026 billing system upgrade complete. CalCCA recommends that PG&E provide regular updates to CalCCA and the CCAs in PG&E's service territory regarding PG&E's progress toward implementation of both the interim and final billing system upgrades, as well as utilization of the 600,000 SAIDs.

B. Barrier #2: Non-Billing Quality Hourly Customer Interval Usage Data Necessary for Load Forecasting and Provided Through ShareMyData Not Reliable

CCAs in PG&E's service territory receive <u>non-billing quality</u> hourly interval data through PG&E's ShareMyData (SMD) platform. Load-serving entities such as CCAs need such data for load forecasting. Accurate forecasting (including day-ahead load forecast submissions to the California Independent System Operator (CAISO)) promotes load management and grid reliability especially during grid stress events. PG&E commits to providing data through ShareMyData within 48 hours of power flow, however the CCAs have experienced many instances of substantial delays in the data, as well as unplanned outages and certification issues with the platform. As described in a report provided to PG&E by East Bay Community Energy (EBCE) and Sacramento Municipal Utility District (SMUD) (EBCE's back-end billing provider (i.e., the interrogating agent)): (1) on at least 40 days in 2022, <u>all</u> usage data was missing until 72-96 hours after power flow; and (2) SMUD was unable to access any usage data on an additional 11 days due to outages or certification issues with the system. Therefore, the EBCE/SMUD report details a total of 51 days in 2022 in which EBCE did not have access to any usage data from PG&E's SMD within 48 hours. In addition, PG&E only allows one interrogating agent per CCA, resulting in CCAs having to wait for the SMD data payload to be processed and transferred by the CCA back-end billing provider, resulting in further delay. The CCAs have asserted, and their analysis demonstrates, that the hourly usage data in SMD often becomes available between 48-96 hours after usage. These delays render the data insufficient for short-term load forecasting in response to grid stress events, especially when incorporating time needed for processing and transfer from the interrogating agent.

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[5] *See* Decision (D.) 22-08-002, *Decision Adopting Real-Time Pricing Pilot and Marginal Generation Capacity Cost Study and Its Usage,* A.19-11-009 and A.20-10-011 (Aug. 9, 2022).

As pricing becomes more time-dependent (i.e., for both time-of-use and dynamic rates), the need for accurate data for load forecasting becomes heightened. Without such data, CCAs will incur additional costs for inaccurate scheduling, potentially resulting in inflated prices and further exacerbating grid reliability issues that both TOU and RTP are designed to improve.

1. PG&E Response and Draft Proposal

While PG&E appears to agree with the CCAs' need for hourly interval data (non-billing quality) within at least 48 hours for load forecasting, PG&E believes that instances of missing or delayed data are isolated to a very small percentage of SAIDs that are encountering metering issues. During a working group meeting, PG&E acknowledged that it would indeed be an issue if CCAs are experiencing more substantial delays (such as those described in the section above, where *all* data in the system is missing at 48 hours) but that these gaps were not present in their retroactive review of the system. PG&E commits to working with the CCAs to determine the root cause of each individual data issue and invites the CCAs to continue working with PG&E's SMD team to identify issues with the platform.[6]

2. CalCCA Response

CalCCA proposes that the SMD issues be addressed on an ongoing basis to determine potential reliability improvements. While the SMD issues should continue to be addressed in the Demand Flexibility proceeding, the Commission can also address these issues in the Data Working Group of its ongoing Distributed Energy Resource proceeding, R.22-11-013, with respect to overall data needs of the CCAs. CalCCA commits to providing PG&E with additional data concerning system-wide issues with SMD. In addition, CalCCA proposes that the Commission require PG&E to conduct an audit of the reliability of its SMD system on a bi-annual basis. The results of such an audit should be available to CCAs to allow CCAs to corroborate the data arrived at through the audit.

C. Barrier #3: Lack of Data on Customer Enrollment in ELRP

PG&E does not provide data to CCAs regarding which customers in its service territory are enrolled in the emergency load reduction program (ELRP), to allow CCAs to enroll customers (verifying eligibility and preventing dual enrollment) in demand response (DR) programs. If dual enrollment with DR programs is prohibited under Demand Flexibility, CCAs will not have the information necessary to enroll customers in any CCA Demand Flexibility programs that take advantage of dynamic pricing. The CCAs have requested that the Commission require the IOUs to provide monthly updates to CCAs on customer enrollment in ELRP.

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[6] There might be a simple reason that the gaps documented by EBCE/SMUD and experienced by other CCAs were not present in PG&E's review of the SMD system. Delayed data were eventually present in the system at 72-96 hours after power flow. While the delays identified by EBCE/SMUD render the data insufficient for CCA short term forecasting purposes, the data in SMD will appear complete if reviewed by PG&E at a later date. These substantial delays are the primary concern of the CCAs. The CCAs do anticipate the miniscule amounts of missing data related to specific SAID metering issues as described by PG&E – however, these miniscule data lapses are not the primary issue highlighted here.

1. PG&E Response and Draft Proposal

PG&E has asserted its legal concerns regarding providing information about demand response provider/s and aggregators' customer enrollment. Therefore, PG&E has advised that it will require Commission approval and funding to provide the ELRP enrollment data to CCAs. PG&E suggests that a broader scope of data sharing can be discussed in the dual participation workshops that PG&E has proposed in its Demand Response application proceeding, Application (A.) 22-05-002, which is considering the continued funding of ELRP and dual enrollment issues.

2. CCA Response

The CCAs generally support PG&E's proposal to resolve this issue in dual participation workshops and the Demand Response application proceeding, A.22-05-002. The CCAs will work with parties in A.22-05-002 but note that the ELRP data shared with CCAs should be aligned across IOUs. For all subgroups, including A.1-A.5, SCE proposes to share enrollment data, while PG&E has stated it has concerns for subgroups A.1-A.5 because of third-party involvement. CalCCA agrees with PG&E that this should be further discussed in the DR Application proceeding.

D. Barrier #4: Potential Non-Equivalent Bill Presentment Under RTP

Even if a customer is served by a CCA, the actual bills continue to be provided by the IOU (with the CCA generation rate incorporated into the IOU bill). However, equivalent bill presentation is not always provided to bundled IOU and unbundled CCA customers; for example, CCAs cannot currently add information on IOU net-energy metering (NEM) summary pages or charts.

Additionally, some comparisons of customer charges under various rate schedules (such as TOU) or programs are presented in informational materials and online portals using the IOU bundled rate as a proxy for CCA rates. In the context of RTP, CCA customers must have equivalent information on bills in terms of real-time pricing charges to make informed decisions and to have an optimal customer experience. Ideally, final bill presentment for RTP inclusive of any charts or visualizations to help customers understand their charges must be prioritized for both bundled and CCA customers.

1. PG&E Response and Draft Proposal

PG&E asserts that communications of dynamic rate information in bills should be discussed later in the Demand Flexibility proceeding after the demand flexibility rates are developed and bill presentation is discussed.

2. CCA Response

CalCCA agrees that bill presentation tools in the context of RTP should be addressed after such rates are developed. In the event additional interactive tools are developed for customers to understand their usage, bills, and rates, CalCCA notes that these tools should utilize CCA rates (rather than an IOU proxy rate) to allow customers to make the most informed, accurate decision. CCAs request that the Commission require the IOUs to work with, and solicit input from, CCAs on these tools to communicate the impacts of dynamic rates effectively and consistently with customers.

E. Barrier #5: CCA Inability to Fulfill Customer Rate Changes

CCAs currently cannot fulfill customer rate change requests – instead, CCA customers wishing to change rates are told to contact their IOU to make a rate change. In the context of dynamic pricing and potential third-party automation of demand response and customers wishing to automatically change CCA/IOU rates, complexities exist regarding customers providing consent for a rate change. In addition, CCA customers may be deprived of an optimal CCA customer experience given that they are forced to contact the IOU to make a rate change.

1. PG&E Response and Draft Proposal

When the California Energy Commission's (CEC's) Load Management Standard (LMS) single statewide tool is ready, the process of customer rate changes is expected to be automated and streamlined through that tool and through third party technologies. Therefore, discussion of customer rate changes should be addressed in the LMS proceeding in the context of the single statewide tool.

2. CCA Response

CalCCA generally agrees that the customer rate change process is likely to be streamlined through the development of the LMS single statewide tool. However, coordination between CCAs and IOUs, and final approval of the tool through the Commission, will be necessary to ensure equitable access to, and cost allocation for, the statewide tool for both unbundled and bundled customers.

III. CCAS IN SCE SERVICE TERRITORY

A. Barrier #1: Lack of Hourly Interval Data for Forecasting/Settlement Needs

Hourly interval data is not provided by SCE to CCAs until the close of the billing cycle (29-31 days after power flow). Lack of timely data hampers CCA load forecasting (including Estimated Settlement Quality Meter Data (ESQMD) and day ahead load forecast submissions to the CAISO) to promote load management and grid reliability. In addition, lack of accurate data will prevent CCAs from timely tracking load correlation from RTP.

1. SCE Response and Draft Proposal

SCE is implementing its Snowflake platform that can provide CCAs with the "raw" or unbilled interval data within two business days after power flow. This is consistent with how daily interval data is provided to third-party Demand Response Proposals (DRPs) and other external parties. SCE is planning to implement the new Snowflake platform by the end of 2023.

No incremental costs are anticipated for CCAs to use in the context of dynamic pricing. The Snowflake platform is part of SCE's Click-Through application that is pending with the Commission.

2. CCA Response

The CCAs appreciate SCE's plans to implement the Snowflake platform to provide hourly interval data within two business days of power flow. It is CalCCA's understanding from meetings with SCE that SCE will provide ongoing support, with particular focus on support during the troubleshooting and testing phase, to assist the CCAs with their utilization of the platform. CalCCA also requests ongoing updates from SCE on its schedule for implementation of the platform.

B. Barrier #2: Lack of Data on Customer Enrollment in DR Programs to Prevent Dual Enrollment

SCE does not provide data to CCAs regarding which customers in its service territory are enrolled in ELRP to allow CCAs to enroll customers (verifying eligibility and preventing dual enrollment) in DR programs. If dual enrollment with DR programs is prohibited under Demand Flexibility, CCAs will not have the information necessary to enroll customers in any CCA Demand Flexibility programs that take advantage of dynamic pricing.

1. SCE Response and Draft Proposal

SCE will use its existing monthly reporting for ELRP to report enrollment to the CCAs. No incremental costs are currently anticipated, but if ELRP is authorized as a permanent program, there may be costs to implement new/expanded reporting indicators for ERLP.

2. CCA Response

The CCAs request that a mock-up report that SCE plans to send to each CCA with the ELRP enrollment information be provided to allow the CCAs to understand the scope of information SCE plans to provide and to ensure the data provided allows the CCAs to prevent dual enrollment. In addition, the CCAs' preference is that the ELRP enrollment information be provided on the existing Customer List to prevent the need to rely on multiple reports.

C. Barrier #3: Potential Non-Equivalent Bill Presentment under RTP

Even if a customer is served by a CCA, the actual bills continue to be provided by the IOU (with the CCA generation rate incorporated into the IOU bill). However, equivalent bill presentation is not always provided to bundled IOU and unbundled CCA customers, which prevents unbundled customers from receiving equivalent information to make informed choices with respect to TOU and RTP. In addition, with TOU rates, the IOUs present their own rate as a proxy for CCA rates on bills. If such a proxy is allowed with dynamic rates (i.e., IOUs are not required to provide all customers (including unbundled customers) with actual CCA rates in billing presentment and data visualizations (prior to price machine outputs being available)), CCA customers will have limited data on which to make decisions. Limitations on the number of pages for CCA bill presentment, graphics, and data formatting may also need to be addressed to ensure that bundled and unbundled customers receive equivalent information.

1. SCE Response and Draft Proposal

Bill presentment issues for RTP should be discussed after the RTP rate design phase of the Demand Flexibility proceeding.

2. CCA Response

CalCCA agrees that the bill presentment issue discussion can be delayed until after the RTP rate design is developed. However, CalCCA notes that equivalent bill presentment is a crucial component for the bundled and unbundled customer experience in RTP and should be prioritized after the RTP rate design component is complete. This prioritization should include testing of bill presentment via EDI as soon as possible. In the event additional interactive tools are developed for customers to understand their usage, bills, and rates, CalCCA notes that these tools should utilize CCA rates (rather than an IOU proxy rate) to allow customers to make the most informed, accurate decision. CCAs request that the Commission require the IOUs to work with and solicit input from CCAs on these potential tools to communicate the impacts of dynamic rates effectively and consistently with customers.

D. Barrier #4: CCA Inability to Fulfill Customer Rate Changes

CCAs currently cannot fulfill customer rate change requests – instead, CCA customers wishing to change rates are told to contact their IOU to make a rate change. In the context of dynamic pricing and potential third-party automation of demand response and customers wishing to automatically change CCA/IOU rates, complexities exist regarding customer consent and privacy. In addition, CCA customers may be deprived of an optimal CCA customer experience given that they are forced to contact the IOU to make a rate change.

1. SCE Response and Draft Proposal

When the CEC's LMS single statewide tool is ready, the process of customer rate changes is expected to be automated and streamlined through that tool and through third party technologies. Therefore, discussion of customer rate changes should be addressed in the LMS proceeding in the context of the single statewide tool.

2. CCA Response

CalCCA generally agrees that the customer rate change process is likely to be streamlined through the development of the LMS single statewide tool. However, coordination between CCAs and IOUs, and final approval of the tool through the Commission, will be necessary to ensure equitable access to, and cost allocation for, the statewide tool for both unbundled and bundled customers.

IV. CCAS IN SDG&E SERVICE TERRITORY

A. Barrier #1: Lack of Hourly Interval Data for Forecasting/Settlement Needs

Hourly interval data is not provided to CCAs until the close of the billing cycle (29-31 days after power flow). Currently, with TOU rates and in the future to provide RTP, lack of accurate data hampers CCA load forecasting (including ESQMD and day ahead load forecast submissions to the CAISO) to promote load management and grid reliability. In addition, lack of accurate data will prevent CCAs from timely tracking load correlation from RTP.

1. SDG&E Response and Draft Proposal

SDG&E is building a technical solution for providing near real-time (i.e., within 2-3 days after power flow) interval data. Once complete, interval data for customers on CCA service will be accessible for the CCAs and their back-office billing provider. SDG&E will provide an application programming interface (API) for the CCAs and their back-office provider to access the data directly through the interface (self-service). The solution leverages interval data in a new SDG&E data lake. The solution requires the CCAs and their back-office provider to build an interface to sync up with SDG&E's API.

The API design and file format will be presented to the CCAs in the summer of 2023. Joint testing of the system should begin in August 2023. SDG&E expects to have the system completed in the fourth quarter, 2023.

The cost estimate for the new system is dependent on CCA usage and frequency of visits to the system. Cost recovery for SDG&E will require Commission authority to modify its CCA tariff.

2. CCA Response

CalCCA appreciates SDG&E's efforts to build a technical solution for providing near real-time interval data. As the CCAs better understand the technical solution, they look forward to additional details and discussion regarding the proposed cost structure and recovery mechanism. The CCAs request regular updates from SDG&E on the status of their new data system.

B. Barrier #2: Data on Customer Enrollment in Demand Response Programs

SDG&E does not provide data to CCAs regarding which customers in its service territory are enrolled in ELRP, to allow CCAs to enroll customers (verifying eligibility and preventing dual enrollment) in DR programs. If dual enrollment with DR programs is prohibited under Demand Flexibility, CCAs will not have the information necessary to enroll customers in any CCA Demand Flexibility programs that take advantage of dynamic pricing.

1. SDG&E Response and Draft Proposal

SDG&E already provides information to the CCAs that denotes whether a customer is participating in an event-based rate, including ELRP and Critical Peak Pricing Default (CPP-D). Additionally, if ordered to do so in this proceeding, SDG&E will share relevant demand response program information.

2. CCA Response

While SDG&E captures ELRP and CPP-D customer identifiers associated with these event-based rates in their weekly customer snapshot reports that they send to the CCAs, CCAs do not readily receive identifiers for customers participating in all demand flexibility programs offered through SDG&E in these weekly snapshots. The CCAs propose that they receive customer identifiers for all demand flexibility programs that customers are enrolled in with SDG&E via the weekly snapshot reports sent to the CCAs.

C. Barrier #3: Potential Non-Equivalent Bill Presentment

Even if a customer is served by a CCA, the actual bills continue to be provided by the IOU (with the CCA generation rate incorporated into the IOU bill). However, equivalent bill presentation is not always provided to bundled IOU and unbundled CCA customers, which prevents unbundled customers from receiving equivalent information to make informed choices with respect to TOU and RTP. In addition, with TOU rates, the IOUs present their own rate as a proxy for CCA rates on bills. If such a proxy is allowed with dynamic rates (i.e., IOUs are not required to provide all customers (including unbundled customers) with actual CCA rates in billing presentment and data visualizations (prior to price machine outputs being available)), CCA customers will have limited data on which to make decisions.

1. SDG&E Response and Draft Proposal

SDG&E proposes to discuss bill presentment issues after the dynamic rate design is complete. SDG&E also proposes to create an online portal for both bundled and unbundled customers that will allow customers to view and download specific pricing and charges for a bill period. To display the required information for unbundled customers, the CCAs will need to send their dynamic pricing and calculations to SDG&E on a daily basis to be uploaded directly onto the online portal without manipulation by SDG&E.

Enabling such an online portal will require a new IT interface and subsequent discussion with the CCAs concerning file format, timing, and display. At a high level, SDG&E is estimating a total of $1.5M - $1.8M for this implementation, which would cover both bundled and unbundled customers.

2. CCA Response

The CCAs appreciate the proposal by SDG&E to create an online portal, for both bundled and unbundled customers, that will allow customers to view and download specific pricing and charges for a bill period. CalCCA requests that the CCAs be able to participate in the development of the tool. Depending on the design of the tool, the CCAs are likely amenable to transmitting their dynamic pricing and calculations to SDG&E on a daily basis to be uploaded directly onto the online portal without manipulation by SDG&E. With respect to costs, since this proposed online portal will be beneficial to both bundled and unbundled customers, the CCAs look forward to understanding SDG&E's perspective on the cost itemization, reasonability, and recovery framework.

D. Barrier #4: CCA Inability to Fulfill Customer Rate Changes

CCAs currently cannot fulfill customer rate change requests – instead, CCA customers wishing to change rates are told to contact their IOU to make a rate change. In the context of dynamic pricing and potential third-party automation of demand response and customers wishing to automatically change CCA/IOU rates, complexities regarding customer consent and privacy issues are implicated.

1. SDG&E Response and Draft Proposal

SDG&E has identified concerns with the CCA's proposal to permit CCAs to change CCA customers' rate enrollments given the authentication and customer experience difficulties associated with the proposal. The parties should discuss this proposal further in the context of the CEC LMS proceeding and the implementation of the single statewide tool, which will likely address the issue of customer rate changes.

2. CCA Response

CalCCA generally agrees that the customer rate change process is likely to be streamlined through the development of the LMS single statewide tool. However, coordination between CCAs and IOUs, and final approval of the tool through the Commission, will be necessary to ensure equitable access to, and cost allocation for, the statewide tool for both unbundled and bundled customers.