

Rulemaking 22-07-005, Order Instituting Rulemaking to Advance Demand Flexibility Through Electric Rates
Track B, Working Group 2
CALIFORNIA COMMUNITY CHOICE ASSOCIATION
Comments on Joint IOU Proposal, Scoping Memo Questions 4.a., 4.b., and 4.e.
August 28, 2023

1. CalCCA Comments on Joint IOU Proposal

- Scoping Memo Question 4a., Price Machine

Required Elements	Description
Organization(s)	California Community Choice Association (CalCCA)
Proposal Name	Joint IOU Proposal for Systems and Processes – Price Machine (Question 4.a.)
Comments	<p>CalCCA provides comments herein on the Price Machine Proposal set forth in Section 2 of the Joint IOU Proposal for Systems and Processes (Proposal). The Proposal addresses Question 4a of the Scoping Memo: <i>What systems and processes should the Commission authorize for computation of dynamic prices for bundled and unbundled customers.</i></p> <p>CalCCA provides these comments on the price machine at this early stage of the Demand Flexibility (DF) proceeding. CalCCA reserves the right to comment further as more information is gained concerning price machine components, costs, and concerns, as well as DF rate design and dynamic pricing. In addition, systems and processes being developed in the California Energy Commission’s (CEC’s) Load Management Standard (LMS) proceeding may impact the price machine, and CalCCA reserves the right to comment further on the price machine as the CEC LMS components are constructed.</p> <ul style="list-style-type: none"> • CalCCA disagrees with the Proposal that CCAs not adopting dynamic pricing should not need access to the price machine. The price machine should be accessible to all CCAs, especially if the price machine contains the functionality to combine generation with transmission and distribution rates (for ex., computing a CCA’s time of use rate through the combination of CCA generation rates with IOU transmission and distribution rates). In addition, to the extent CCAs develop dynamic pricing, even if a CCA’s rate design does not conform to the DF OIR rate design, all CCAs should have access to the statewide price machine. • At this stage, CalCCA agrees with the Proposal that options should be held open for the price machine to consolidate IOU and CCA prices, or for the consolidation of delivery and generation prices to be done elsewhere. • CalCCA opposes the Proposal to house one price machine in each IOU, or to have one consolidated price machine for all three UDCs. CalCCA also opposes having separate price machines in each IOU and each CCA. Instead, CalCCA supports a single statewide price machine administrator operating independently from the IOUs and LSEs. Housing the price machine outside of the IOUs (i.e., in a single statewide independent entity physically separate from the UDCs) will promote a level playing field between the IOUs and

	participating LSEs, will likely promote efficiencies and prevent duplication of efforts and multiple vendors.
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- Scoping Memo Question 4.b., 4.e. (CCA Enablement)

Required Elements	Description
Organization(s)	California Community Choice Association (CalCCA)
Proposal Name	Joint IOU Proposal for Systems and Processes – CCA Enablement (Questions 4.b., 4.e.)
Comments	<p>CalCCA’s comments set forth herein supplement, and do not replace, the CalCCA Proposal submitted to the SCE Sharepoint on August 11, 2023, regarding Question 4.b. In addition, CalCCA reserves the right to comment further on these and other Proposals during the Demand Flexibility (DF) proceeding, as additional barriers for CCAs offering dynamic pricing may be identified. CalCCA has heretofore presented barriers for CCAs offering dynamic pricing based on the dynamic offerings currently planned for near-term implementation – largely, day-ahead hourly rates. However, additional barriers, as well as comments on other party identified barriers, are likely to arise if load-serving 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 (CPUC) 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.</p> <p>CalCCA Comments on Joint IOU Proposal for Systems and Processes – CCA Enablement (Questions 4b, 4e):</p> <ul style="list-style-type: none"> • <u>Joint IOU Proposal Section 6.a. (PG&E CCA Enablement)</u> <ul style="list-style-type: none"> ○ <u>Section 6.a.1. - Access to Interval Data for CCA Forecasting</u> <p>CalCCA does not agree with PG&E’s characterization of the ShareMyData (SMD) system accuracy, particularly that CCA stated needs are “generally fulfilled” or “that overall on average 99% of service agreement usage data is made available across all CCAs within two days of power flow.” (Joint IOU Proposal at 12). As detailed in the CalCCA proposal, data in SMD often only becomes available to CCAs between 48-96 hours after transmittal, rendering the data insufficient for its purpose – short-term load forecasting. (See CalCCA Proposal at 3-4). CalCCA requests that (1) SMD system-wide issues continue to be identified and addressed in this proceeding, (2) the Commission address the SMD issues in the Data Working Group of its Distributed Energy Resource proceeding, R.22-11-013; and (3) the Commission require PG&E to conduct an audit of the reliability of its SMD system on a bi-annual basis, with the results of such audit made available to CCAs to allow CCAs to corroborate the data arrived at through the audit.</p> <ul style="list-style-type: none"> ○ <u>Section 6.a.2. - Billing-Quality Interval Data</u> <p>CalCCA appreciates and supports 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. In response, CalCCA has two additional requests: (1) that the IOUs confirm that PG&E’s proposal is to increase the number of service address IDs (SAIDs)</p>

providing the hourly interval usage data if the day-ahead hourly real time pricing pilot (DAHRTP) and net billing tariff (NBT) rates, along with CCA additional needs, exceed PG&E's planned 600,000 SAIDs prior to the July 2026 billing system upgrade complete; and (2) that PG&E provide regular updates to 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.

- Section 6.a.3. – Providing PG&E Emergency Load Reduction Program (ELRP) Program Data to CCAs

CalCCA acknowledges PG&E's concerns regarding providing customer ELRP enrollment data to CCAs, and requests that this issue be addressed in the dual participation workshops in PG&E's Demand Response application proceeding, A.22-05-002. The CCAs commit to working with parties in that proceeding, but note that the ELRP data shared with CCAs should be aligned across IOU territories.

- Section 6.a.4. – Bill Presentment

CalCCA agrees that any bill presentation issues in the context of dynamic pricing can be addressed after the dynamic rates are 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 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 decisions. 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. In addition, CalCCA agrees with PG&E that additional research will be necessary for potential transactive billing.

- Section 6.a.5. – CCA Ability to Change Customer Rates

CalCCA agrees that the single statewide tool being developed in the California Energy Commission's (CEC's) Load Management Standards (LMS) proceeding will likely address and streamline the process of customer rate changes. 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.

- **Joint IOU Proposal Section 6.b. (SCE CCA Enablement)**

- CCA Forecasting/Settlement Needs

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.

- Data Needs on Customer Enrollment in Demand Response (DR) and Dynamic Pricing Programs

CalCCA requests that SCE confirm that it will use its existing monthly reporting for ELRP to report enrollment to the CCAs. However, 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. In addition, 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.

- Bill Presentment

CalCCA agrees that bill presentment issues, including costs for such bill presentment, 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.

- CCA Inability to Fulfill Customer Rate Changes

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.

- **Joint IOU Proposal Section 6.c. (SDG&E CCA Enablement)**

- Section 6.c.1. – Hourly and 15-minute interval data:

CalCCA appreciates SDG&E's efforts to build a technical solution for providing access to real-time interval data within two to three days after power flow. As the CCAs better understand the technical solution, they look forward to additional details and discussion regarding the proposed cost structure and recovery mechanism. In particular, the CCAs request that SDG&E confirm that the interval data will be provided for all residential and commercial customers. The CCAs in SDG&E's service territory request regular updates from SDG&E on the status and timing of their new data system as well as confirmation that MV90 meters will be in scope.

- Section 6.c.2 – Data on customer enrollment

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.

- Section 6.c.3. – Bill presentment

CalCCA agrees that any bill presentation issues in the context of dynamic pricing can be addressed after the dynamic rates are 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.

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.

- Section 6.c.4 – CCA Customer Rate Change

SDG&E's characterization of CalCCA's position on the customer rate change issue is misguided and unreasonable. The CCAs are not requesting that they be enabled to change their customers' rates, and thus bypass SDG&E's role as a billing agent. Instead, the CCAs raise the issue of concerns regarding customer rate changes for the future when the CEC LMS dynamic rates go into effect and customers potentially have the ability to change their rates through third party automation providers. In any event, the single statewide tool being developed in the CEC LMS proceeding will likely streamline the customer rate change process and address many of these concerns. Coordination between CCAs and IOUs will be necessary to ensure equitable access to, and cost allocation for, the statewide tool for both unbundled and bundled customers.

2. Comment Summary Table

Proposal: Joint IOUs

Scoping Question	Position			
	Generally support	Support with modifications	Do not support, unless modified	Do not support
4 Price Portal				
4a, 4f Price Machine			CalCCA	
4b, 4e CCA Enablement (IOU-specific)				
PG&E		CalCCA		
SCE		CalCCA		
SDG&E		CalCCA		
4c Third Party Enablement				
4d Transactive Energy/Subscription Manager	<i>Incorporated in Energy Division Proposal – see above</i>			
4e Cost Recovery		CalCCA		