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Dynamic pricing design in California

in "California's progress toward the 7GW goal" it is stated "New IOU efforts, such as hourly dynamic rates, may improve the outlook".

Lunar is an advocate of dynamic pricing and provide automated optimisation of ESS and EVs against dynamic pricing in several jurisdictions. California is our main target market currently and we have ESS deploying there at scale (Lunar and 3rd party). However, we believe the design of the Californian dynamic pricing pilots is flawed and that these do not make compelling customer offers, due to the subscription approach. As such we will not be offering dynamic pricing optimisation to our customers while the dynamic pricing is billed in its current form and we do not believe California will see significant uptake of dynamic pricing. We believe the entire site load on an hourly basis should be simply billed all against the dynamic rate (not just the deviation compared to a subscription value), as is the case in all other territories in which we participate in dynamic pricing (UK, Japan, Europe, etc.)