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Silicon Valley Clean Energy Comments on the Draft Staff Analysis of Potential Amendments to the Load Management Standards

Additional submitted attachment is included below.



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April 23, 2021

California Energy Commission
Docket Office, MS-4
Re: Docket No. 19-OIR-01
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Comments of Silicon Valley Clean Energy on the California Energy Commission Docket No. 19-OIR-01:
Proposed Amendments to the Load Management Tariff Standard

Dear Commissioners:

[Silicon Valley Clean Energy](#) (SVCE) appreciates the opportunity to submit comments to the California Energy Commission (CEC) regarding the Draft Staff Analysis of Potential Amendments to the Load Management Standards (“Staff Report”).

SVCE is a community choice aggregator (CCA) serving thirteen communities in the San Francisco Bay Area. SVCE's mission is to reduce dependence on fossil fuels by providing carbon-free, affordable and reliable electricity and innovative programs within the community.

SVCE strongly supports the goals and objectives of the rulemaking to streamline and leverage automated demand flexibility to support achieving a carbon-free, affordable, and reliable grid. In addition, SVCE submits the following comments for consideration by the CEC.

1. The Commission should provide additional documentation on the MIDAS rate database design and anticipated use for stakeholder review and input.

SVCE fully supports the goal of constructing a statewide database of machine-readable rates. Given the complexity and nuance of retail electricity rates, key decisions regarding the scope, design and functionality of the database will necessarily dictate the range of potential use cases where it can be leveraged. The design of the database will therefore dictate ultimately how useful (and used) it will be to third parties and customers. Information provided in the Staff Report was highly appreciated; however, additional documentation should be shared with stakeholders for review and input, including specifically a more comprehensive description of the design and anticipated use. For examples, topics that merit further clarification and description include whether or how: 1) non-energy components of rates are expected to be captured and used, 2) CCA generation rates and investor-owned utility (IOU) unbundled transmission and distribution rates are expected to be organized, and 3) NEM rates and annual billing will be captured. Clarification of the specific priority use cases that guided the database design, as well as anticipated limitations, would also be highly instructive and inform stakeholder input. Careful consideration at this stage will help ensure that the full potential of the rate database will be realized, and that the benefits will exceed implementation costs.



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2. The Commission should leverage learnings from non-compliance driven implementations of Green Button Connect platforms to inform the requirements for the standard rate information access tool.

SVCE launched the first UL-tested Green Button Connect platform with [UtilityAPI](#) in March 2020 called the [SVCE Data Hive](#). The Data Hive provides free, instant, authorized access to standardized utility and billing data for third parties, such as solar and storage installers, demand response providers, and energy service companies. Since launching the platform, SVCE has gathered input from hundreds of individuals and entities, including residential and commercial customers, third parties, local governments, non-profits and other industry stakeholders. Based on their input, SVCE strongly encourages the CEC to require the following for the standard rate information access tool:

- a. **The rate information access tool should be standardized across all utilities.** Third parties typically operate across multiple CCA, IOU and public-owned utility (POU) service territories. Third parties operating in SVCE service territory, for instance, are also at a minimum serving customers of PG&E, San Jose Clean Energy, City of Palo Alto Utilities, Silicon Valley Power, and Peninsula Clean Energy. This was one of the most commonly cited pain points by third parties – specifically, the cost and complexity of integrating multiple unique data access methods into their business processes. As already emphasized in the Staff Report, the Commission is absolutely right to require that the rate information access tool be standardized across all utilities, which will be critical for its success.
- b. **The registration process for third parties to use the rate information access tool should be streamlined and free.** Registering with the SVCE Data Hive can take less than five minutes and incurs no direct or indirect costs to third parties¹. Over 140 third parties have registered to date². By contrast, registering with any one of the California’s IOU Green Button Connect platforms is estimated to take several months and can incur tens of thousands of dollars in integration costs.
- c. **The customer authentication step should only require information that is readily available in a wallet or purse.** For customer lookup, for instance, only a phone number or email address need be required. Then, a one-time passcode can be issued for authentication. This is an industry standard method for authentication, prevalent in the banking and tech sectors. Eliminating the need for a customer to have their utility account number on hand (which they won’t) or to remember their online account credentials (which they won’t) such as the PG&E Share My Data platform will greatly improve the customer experience, as well as prevent attrition and delays in the enrollment process of flexibility services.
- d. **Ongoing authorization to access a customer’s rate is required for many use cases.** SVCE launched an electric vehicle smart charging pilot with [ev.energy](#) called [GridShift: EV](#)

¹ The SVCE Data Hive registration form for third parties can be found here: <https://utilityapi.com/register/svce>

² SVCE Data Hive Directory: <https://data.svcleanenergy.org/directory>

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[Charging](#). Through this pilot, a customer downloads the app, connects their vehicle, connects to the Data Hive to pull their current electricity rate, and sets their driving preferences. Then, the platform automatically optimizes their charging schedule to minimize their retail electricity costs and grid emissions. For this type of use case, it is paramount that the electricity rate that's being used by the platform is the customer's *current* rate – otherwise, mistakenly charging the vehicle based on a different rate can easily result in bill spikes. Our GridShift pilot leverages the Data Hive, which enables ongoing authorizations which ensures that charging is being optimized using the customer's current rate. The rate information access tool should enable ongoing authorizations, which will be relevant for a variety of key load management use cases.

- e. **Last but not least, the streamlined use of the rate information access tool must not rely on customers knowing who their load serving entity is, or third parties being familiar with CCA service territory boundaries.** The other primary barrier experienced by third parties using the Data Hive tool is that customers often do not know whether they are a CCA customer or bundled utility customer. Third parties also may not be familiar with the exact service territory boundaries of CCAs, and know which load serving entities may serve a region. For the standard rate information access tool to be successful, it must not require this knowledge of either the customer or the third party. An address or geolocation look-up is one technical solution that can easily address this consequential challenge.

3. Discriminatory data access that CCAs have been subject to by the California Public Utilities Commission and IOUs should not delay the implementation timeline of the proposed standard. Instead, this standard should provide yet further justification to accelerate the rectification of inadequate and unjustifiable data sharing practices.

Currently, CCAs operating in PG&E service territory do not receive advanced metering infrastructure (AMI) data from PG&E with sufficient quality, granularity, completeness, and timeliness required to comply with the proposed requirement to propose an hourly rate. In fact, discriminatory data access inhibits CCAs from effectively carrying out the most basic daily functions of a load serving entity, including load forecasting and innovative rate design. Current practices are counter to the legislative intent of California's billions of dollars in smart grid investments³. And, there are significant real-world consequences. Recently and notably, CAISO determined that it directly contributed to causing the rolling blackouts last August 2020 in the Final Root Cause Analysis⁴. The Commission should not let the current state of discriminatory data access practices delay the implementation of the proposed standard – achieving our overarching goals of an affordable, reliable and decarbonized grid absolutely require rectifying these practices.

³ Senate Bill 17 (Padilla 2008)

⁴ <http://www.caiso.com/Documents/Final-Root-Cause-Analysis-Mid-August-2020-Extreme-Heat-Wave.pdf>



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4. Longer-term, the Commission should require a single, centralized permission-based information access platform managed by a government or non-profit entity that includes machine readable rates as well as all other data that customers may choose to share with third parties that would be needed to successfully and seamlessly deploy demand flexibility solutions (interval data, billing data, emissions signal, DRP status, etc.).

Achieving California’s ambitious energy and climate goals requires an electric power system comprised of a vibrant participatory distribution side that complements and is coordinated with the bulk power system, high-voltage transmission and wholesale markets. Fundamental changes to the underlying structure of the electricity markets and regulations are needed to achieve this vision. To date, growth of the distribution side has been stymied, due in large part to the incentive structures of dominant entities – notably the IOUs – being *misaligned* with actions to support customer adoption of technologies and solutions that would help achieve our policy goals and objectives. Permission-based data sharing is a linchpin for a robust, innovative and participatory distribution side. The MIDAS rate database and other components of the Staff Report represent a critical juncture to address business model misalignment and set California on a glidepath toward a 21st century electric power industry that best serves California’s policy goals. The Commission should require responsibility for these critical systems to reside with government or other non-profit entities who are best positioned to serve the public interest, and it should be a single, centralized platform that includes all data relevant for the adoption and operationalization of load management solutions.

SVCE thanks the CEC for consideration of the above comments and commends your leadership. If you should have any questions, please contact SVCE’s Director of Decarbonization & Grid Innovation Programs, Aimee Bailey at aimee.bailey@svcleanenergy.org.

SVCE looks forward to a continued partnership with the CEC and other stakeholders in this rulemaking.

Sincerely,

A handwritten signature in blue ink that reads "Girish Balachandran".

Girish Balachandran
Chief Executive Officer