

DOCKETED

Docket Number:	21-OIR-03
Project Title:	2022 Load Management Rulemaking
TN #:	246720
Document Title:	Ethan Matthes Comments - Follow up comments in opposition to 2022 LMR
Description:	N/A
Filer:	System
Organization:	Ethan Matthes
Submitter Role:	Public
Submission Date:	10/21/2022 11:25:17 AM
Docketed Date:	10/21/2022

*Comment Received From: Ethan Matthes
Submitted On: 10/21/2022
Docket Number: 21-OIR-03*

Follow up comments in opposition to 2022 LMR

In times of crisis or emergency, people sacrifice. They've cut back on electricity use voluntarily the past two Summers when much of the state was well over 100F and at risk of avoid rolling blackouts.

If I follow the logic of LMR proponents, we are in a climate crisis that requires the collective sacrifice of all Californians 24/7 over a period of several years. California has years of experience applying demand response programs to industrial/commercial sector and it's assumed that the typical California home can be modeled and shaped similarly. To achieve a carbon-neutral electric grid, all retail electric customers would be "incentivized" to modify their behavior by shaping their load to balance the solar and wind resources supply fleet. Hydroelectric is drying up, carbon-emitting supply and nuclear are phasing out, and we have no choice. Those who do not or cannot adopt the EV and HVAC use schedules shall bear the highest retail rates.

From what I understand, electricity is essential to our way of life. Utilities were formed to sell electricity to customers. They enjoy a monopoly over service territory and there's little competition to keep rates affordable absent regulation. There is no other grocery store for electric service. While regulatory bodies have long-run political risk if they fail to serve the public, most Californians may not have time to follow regulatory proceedings.

Utility supply procurement is subject oversight from the state's public utility commission or their respective city council or community board. LMR is a tremendous opportunity for the utilities because they retain their monopoly while shifting market risk to their customers as well as benefit from a customer-provided grid/ancillary service for free.

How does this risk shift to the retail customer affect the utility's incentive to maintain and improve the grid?

Does the retail customer exist to serve the utility?

Is maintaining comfortable temperatures in the home after work or using appliances to prepare meals a luxury?

A lot can happen to the California economy before voters get a chance to weigh in.

Rather than trying to modify the behavior of individual households, that likely don't have the resources to install solar + battery and respond to hourly price signals, could solar + battery projects be developed at a community or district level where the pooled resources and expertise are more likely to be available?

Why can't load shaping be better addressed through the Integrated Resource Plan process?

I'm not aware of much progress being made on having independent distribution grid operators either. How will/can retail market participants be treated fairly?

Why are we now targeting retail electric customers before developing the other options?