

<b>DOCKETED</b>	
<b>Docket Number:</b>	23-LMS-01
<b>Project Title:</b>	Load Management Standards Implementation
<b>TN #:</b>	250197-1
<b>Document Title:</b>	2022 Load Management Standards Implementation, 3CE Request for Extension; LMS § 16231(a)(3)(A)
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**Subject:** Docket No. 23-LMS-01; 2022 Load Management Standards Implementation, 3CE Request for Extension; LMS § 1623.1(a)(3)(A)  
**Date:** Tuesday, May 16, 2023 5:17:02 PM  
**Attachments:** [image001.png](#)  
[Attachment 1.pdf](#)  
[Attachment 2.pdf](#)

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May 16, 2023

Drew Bohan  
Executive Director  
California Energy Commission  
715 P Street  
Sacramento, CA 95814-5512

Re: Docket No. 23-LMS-01; 2022 Load Management Standards Implementation  
3CE Request for Extension; LMS § 1623.1(a)(3)(A)

Dear Executive Director Bohan:

In response to Central Coast Community Energy's (3CE) board decision to consider compliance to the CEC LMS, 3CE hereby submits a request for extension approved by the Board of 3CE of the requirement under the LMS, section 1623.1(c), for 3CE to upload by July 1, 2023 its existing time-dependent rates applicable to its customers to the California Energy Commission's (Commission's) Market Informed Demand Automation Server (MIDAS) database. 3CE's Board-approved plan for extension is attached hereto as [Attachment 1](#).

3CE previously joined in a request for extension, filed in Docket No. 23-LMS-01 on April 28, 2023, of the July 1, 2023 MIDAS upload requirement submitted by the three investor-owned utilities and the thirteen "Large CCAs" subject to the LMS requirements, including 3CE (the Joint Parties' Request). The Joint Parties' Request is attached hereto as [Attachment 2](#). As noted in the Joint Parties' Request, the LMS regulations do not explicitly provide a process for CCAs to request extension of the July 1, 2023 MIDAS upload requirement. Section 1623.1(a)(3)(A) provides the only mention of the ability to delay compliance with a LMS requirement but requires approval of a compliance plan for delay by a CCA governing board prior to submission of that plan to the Commission's Executive Director. CCA compliance plans, however, are not due under the LMS until April 1, 2024, which creates an ambiguity as to how CCAs seek extension from the July 1, 2023 MIDAS upload requirement.

Despite this ambiguity and in an abundance of caution, 3CE submits this Board approved MIDAS upload extension in addition to the previously submitted Joint Parties' Request. The justification for the extension is detailed in the Joint Parties' Request and includes the need for finalization of the requirements for Rate Identification Numbers required for the MIDAS upload, and that the MIDAS system is not fully stabilized and ready for the uploads.

Accordingly, 3CE seeks approval under the LMS, consistent with 3CE's Board approved extension, for an extension of the MIDAS upload consistent with the Joint Parties' proposal for the alternative timeline involving staged implementation of the MIDAS upload, as described in Section 4 of the Joint Parties' Request.

Thank you for your consideration.

Sincerely,

**Jerri Strickland**

**Policy Advisor**

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