

DOCKETED

Docket Number:	23-LMS-01
Project Title:	Load Management Standards Implementation
TN #:	250197-3
Document Title:	2022 Load Management Rulemaking Request for Extension
Description:	N/A
Filer:	Kristine Banaag
Organization:	PG&E
Submitter Role:	Public
Submission Date:	5/17/2023 4:54:34 PM
Docketed Date:	5/17/2023

DRAFT RESOLUTION NO. OB-2023-01

A RESOLUTION OF THE OPERATIONS BOARD OF DIRECTORS OF THE CENTRAL COAST COMMUNITY ENERGY AUTHORITY TO APPROVE AN INTERIM COMPLIANCE PLAN FOR THE CALIFORNIA ENERGY COMMISSION'S LOAD MANAGEMENT STANDARDS

WHEREAS, Central Coast Community Energy ("3CE") is a Joint Powers Authority established and operated pursuant to California Government Code section 6500 *et seq.*, to study, promote, develop, conduct, operate, and manage energy-related climate change programs in the California Central Coast region of Santa Cruz, Monterey, San Benito, Santa Barbara Counties, and certain cities within San Luis Obispo County, and

WHEREAS, The CEC approved revisions to the Load Management Standards on January 20, 2023, that require large CCAs, Investor Owned Utilities (IOUs), and Publicly Owned Utilities (POUs) to develop hourly location-based electric rates and systems for reporting current and future time-dependent rates; and

WHEREAS, Members of 3CE's Regulatory and Finance teams have collaborated to proactively identify and address any potential barriers to compliance by participating in several working groups, responding to CEC requests for information, preemptively testing MIDAS upload and download capabilities, and informing discussions with CEC staff and Commissioner McAllister via CalCCA; and

WHEREAS, There is not currently a technologically feasible or cost-effective process in place for the CCAs or IOUs to combine their rates and upload to MIDAS by July 1, 2023, as is required by §1623.1(c) of the LMS. There are differences in CCA and CEC interpretations around who is responsible for doing so; and

WHEREAS, the CEC has not formally released the final specifications or guidelines for how rates must be categorized and formatted before upload to MIDAS, and MIDAS itself requires updated documentation and appears to remain under development; and

WHEREAS, Addressing these foundational issues is crucial for 3CE staff to develop further plans for compliance with future requirements described in the Load Management Standards.

WHEREAS, Requiring 3CE to upload combined rates by July 1, 2023 would result in extreme hardship to 3CE; and

WHEREAS, §1623.1(a)(2) of the Load Management Standards authorize a CCA's board to delay or modify compliance with LMS requirements, including MIDAS upload requirements, if "despite a Large POU's or Large CCA's good faith efforts to comply, requiring timely compliance with the requirements of this article would result in extreme hardship to the Large POU or CCA," or would not be "technologically feasible or cost effective"; and

NOW, THEREFORE, Operations Board of Directors of the Central Coast Community Energy Authority does hereby resolve, determine, and order as follows:

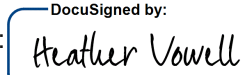
1. The Board hereby authorizes this Resolution to serve as 3CE's interim compliance plan for implementation of the Load Management Standards
2. The Board hereby authorizes an extension of the July 1st deadline for uploading 3CE rates to MIDAS to no less than nine months after compliance barriers have: (a) been resolved, (b) in a manner that allows for cost effective and technologically feasible CCA compliance.
3. If such barriers are not resolved, the Board authorizes 3CE staff to make additional modifications to the interim LMS compliance plans as necessary.
4. This Resolution shall take effect immediately upon adoption and be sent to the CEC Executive Director.


PASSED AND ADOPTED by the Operations Board of the Central Coast Community Energy Authority this 10th day of May 2023 by the following vote: 13/0/5

AYES: Guertin, Harvey, Huffaker, Imhof, Miyasato, Serino, Pia, Reynolds, Stilwell, Vidro, Wood, Vice Chair Goldstein, Chair Johnson

NOES: None

ABSENT: De La Rosa, Espinosa, Mendez, Lewis, J., Lewis. T.

Attest: 
Board Clerk, Heather Vowell


Chair, Derek Johnson