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May 26, 2023

California Energy Commission
Docket Office, MS-4
Re: Docket No. 23-LMS-01
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: Docket No. 23-LMS-01 – Comments of Southern California Edison Company on Initial Determination and Recommendation of the Executive Director on Joint Parties' Request to Extend MIDAS Upload Deadline

Dear Commissioners:

Pursuant to 20 CCR § 1104(e), Southern California Edison Company (SCE) provides these written comments in response to the Memorandum to the California Energy Commission (CEC) from Executive Director Drew Bohan entitled “Initial Determination and Recommendation of the Executive Director on Joint Parties' Request to Extend MIDAS Upload Deadline” (the Initial Determination), docketed in the above-referenced proceeding on May 19, 2023, and scheduled to be considered by the CEC at its May 31, 2023 business meeting.

BACKGROUND

SCE was one of several load-serving entities (LSEs) that joined a letter to the Executive Director dated April 28, 2023, requesting an extension of the July 1, 2023 deadline set by the revised load management standards (LMS) for the LSEs to upload their time-dependent rates to the Market-Informed Demand Automation Server (MIDAS) Database.¹

The Initial Determination states that CEC staff believe that large community choice aggregators (CCAs) and large investor-owned utilities (IOUs) subject to the LMS can upload unbundled time-dependent rates charged to CCA customers by August 1, 2023 and remaining time-dependent rates that include price modifiers by October 1, 2023. The Initial Determination recommends that the CEC adopt these extensions based on staff’s conclusion that the revised deadlines should allow sufficient time to alleviate any technological issues the LSEs may face in uploading their time-dependent rates.

SCE COMMENTS

SCE appreciates the CEC’s consideration of the extension request, the thoughtful discussion in the Initial Determination, and the additional time granted for uploading rates. SCE

¹ See CCR §§ 1621-1625; see also Docket 21-OIR-03, TN# 248526, Office of Administrative Law Approval of Revisions to the Load Management Standards, docketed 1/25/23, available at <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=21-OIR-03>. 2

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supports the goal of the LMS to facilitate development of a statewide signaling system that can be used by mass-market end-use automation to provide load flexibility on the grid. To that end, SCE has uploaded test data to MIDAS multiple times and continues to identify system successes and concerns in regular dialogue with CEC staff regarding testing results. Additionally, SCE has engaged with CEC staff in educational discussions to further a common understanding of electric rate composition and the price signals needed to facilitate load management. SCE will use the extra time granted to prepare to manually upload rates to MIDAS in compliance with the revised LMS and deadlines.

SCE notes two points of clarification. First, while the Initial Determination expressly extends the deadlines for uploads of *unbundled* time-dependent rates charged to CCA customers to August 1, 2023, and time-dependent rates that have price modifiers to October 1, 2023, it does not directly address whether the deadline for upload of *bundled* rates with *no* price modifiers is also being extended. However, because the Initial Determination states that the extensions will (in addition to addressing the “unbundled rates” and “price modifiers” issues) “alleviate any technological infeasibility that may have frustrated the Joint Parties’ efforts to upload their existing time dependent rates,”² SCE understands the Initial Determination to remove the July 1, 2023 deadline in its entirety and replace it with two new deadlines, namely (i) August 1, 2023 for bundled and unbundled rates with no price modifiers, and (ii) October 1, 2023 for price modifiers. Second, although the Initial Determination references “rates with price modifiers,” SCE does not understand *non-time-dependent* price modifiers³ to fall within the scope of the “time-dependent rates” and “time-dependent cost components” that CCR § 1623(b) requires to be uploaded to MIDAS. Further, SCE does not believe that such non-time-dependent modifiers add value to a system intended to provide *time-based* pricing signals.

Assuming these points of clarification are correct, SCE will endeavor to upload all of its existing time-dependent rates to MIDAS by August 1, 2023. Because the only *time-dependent* modifier in SCE’s rates is the Critical Peak Pricing (CPP) program modifier, SCE will make a good faith effort to upload that modifier by August 1, 2023 as well. In the event SCE encounters any technical or other challenges relating to meeting the August 1, 2023 deadline for all time-dependent rates and the CPP modifier, as a backup, SCE will pause work on the upload of the CPP modifier and upload that modifier by the October 1, 2023 deadline.

SCE will be unable to implement an automated solution to uploading prices from SCE’s billing system by August 1, 2023. Accordingly, SCE will manually upload the required rates during each rate factor change. SCE also will implement a daily process to upload next day prices for its Real Time Pricing (RTP) rates where the daily price is determined by the previous day’s peak temperature. Finally, SCE will implement manual processes to upload Critical Peak Pricing (CPP) event pricing on a per-event basis. SCE intends to replace these manual processes with an automated process within the next approximately nine months.

² Initial Determination at 3.

³ Non-time-dependent price modifiers include the CARE and FERA programs, medical baseline, line location, and others.

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To the extent any complications arise with the initial upload process, the daily RTP upload process, and/or the event-driven CPP price upload process, SCE will make efforts to remedy the issues quickly while communicating and working with CEC staff. SCE has a good relationship with CEC staff working on these matters and has been in regular communication during testing efforts. Once the MIDAS system is finalized and SCE has implemented an automated process for uploading prices, the number of potential complications is likely to diminish as uploading and maintaining prices to MIDAS becomes more routine and experience with the process is gained.

CONCLUSION

SCE appreciates the opportunity to file these comments. SCE looks forward to working with the CEC and other rate approving authorities on load management and dynamic pricing initiatives. Please feel free to contact me, or Brandon Sanders at Brandon.Sanders@sce.com, if you would like to discuss this matter.

Very truly yours,

_____/s/_____

Dawn Anaiscourt