

DOCKETED

Docket Number:	23-LMS-01
Project Title:	Load Management Standards Implementation
TN #:	253790
Document Title:	SDG&E January 2024 LMS MIDAS Update
Description:	N/A
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Organization:	San Diego Gas & Electric Company (SDG&E)
Submitter Role:	Public
Submission Date:	1/2/2024 3:48:50 PM
Docketed Date:	1/2/2024



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January 2, 2024

Mr. Drew Bohan
Executive Director
California Energy Commission
715 P Street
Sacramento, CA 95814

RE: San Diego Gas & Electric (SDG&E) Update Regarding Progress Toward Uploading Hourly Dynamic Pricing Rates into the MIDAS Database (Docket No. 23-LMS-01)

Dear Mr. Bohan:

On May 31, 2023, the California Energy Commission adopted Order No 23-0531-10 (“Order”) regarding the Joint Parties’ Request for Delay of July 1, 2023, MIDAS Rate Upload Deadline. Ordering Paragraph 3 states:

SDG&E shall upload hourly dynamic prices offered through its Vehicle-Grid Integration (VGI) rate and Grid Integrated Rate (GIR) by April 1, 2024. SDG&E shall file reports of its progress towards meeting this deadline with CEC staff on July 1, 2023, October 1, 2023, January 1, 2024, and April 1, 2024.

Accordingly, SDG&E is providing an update on the progress of its work toward developing an automated system to support the upload of hourly dynamic pricing rates, include its VGI and GIR rates, by April 1, 2024.

Status Update

SDG&E met with CEC staff on November 8, 2023, to discuss the status of its uploads to MIDAS. As of October 1, 2023, over 99% of SDG&E’s time dependent rates and modifiers available to SDG&E customers were uploaded into MIDAS. SDG&E has not yet uploaded information pertaining to the two hourly rates – the VGI and GIR rates – for which it was previously granted an extension through April 1, 2024. These two rates impact a small proportion of SDG&E customers (570 meters or 0.044% of the population).

However, uploading hourly rate structures into MIDAS will be an extremely resource intensive process absent an automated system. Development of such a system likely necessitates additional IT development. While SDG&E understands that this automation may

be needed in the future as additional hourly pricing offerings become available, SDG&E is concerned that completing this work now (for such a limited portion of customers) may not be cost-effective. As such, we continue to evaluate whether an extension beyond the April 1, 2024, timeframe, and/or an exemption for certain rates, may be appropriate to address the timing and cost issues discussed above.

SDG&E is also participating in meetings with CEC staff and the other investor-owned utilities to establish mutually agreeable principles to govern the remaining MIDAS uploads. Our timeline and scope of uploads for hourly pricing will be informed by these discussions.

We will remain in close communication with CEC staff as our exploration of options continues. SDG&E intends to be transparent in its communications with CEC staff to align on focused efforts to complete high impact MIDAS uploads that help achieve the goals of the Load Management Standards in a cost-effective manner.

This letter is being submitted on January 2, 2024, due to the observed holiday on January 1, 2024. Please do not hesitate to contact me should you have any questions about this update.

Sincerely,



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Regulatory Affairs Manager

Cc: Michael Sokol, CEC
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