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Filer:	Stefanie Wayland
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CCA RIN Lookup Tool Needs & Considerations

Load Management Standards and Statewide Rate Tool Workshop

Contact: Michael Quiroz, mquiroz@avaenergy.org

Clarity

- How will the RIN Lookup Tool overlap and function with MIDAS and the Price Machine?
- How will existing rate change processes and comparison tools be handled in the context of the RIN Lookup Tool?
- Will the tool give an average bill example for each rate, or incorporate actual usage?
 - Bill estimates based on actual usage data would be more useful but would increase complexity/cost of tool
 - LSEs would need to identify a source, means of processing, and place to store historical usage data
- Do stakeholders envision the RIN Lookup Tool allowing customers to switch between LSEs? If customers are allowed to switch between IOU and CCA RINs:
 - There need to be adequate consumer protections, including a clear signal that customers are switching LSEs
 - Consideration must be given to existing opt-out processes

Rate comparison disclaimer

- Because not all rate modifiers are included in MIDAS, bill comparisons between different RINS could be inaccurate
- The CCAs recommend a disclaimer be included somewhere in the tool that it shouldn't be used to compare rates between IOUs and CCAs

Cost recovery

- CCAS have ongoing concerns on LMS cost effectiveness and recovery
- The CCAs suggest usage-based pricing, above a certain allowance of queries, to recover costs associated with tool development and operation
 - The allowance could be set such that individual customers would not have to pay to use the tool, but third parties commercializing the tool would contribute to its upkeep
 - Usage based pricing could also cover MIDAS upgrades or further investments in the RIN Lookup tool
- Frequent rate changes would make cost recovery difficult. The CCAs suggest a limit of 1 rate change per year.

PII and Security

- Some parties have proposed the tool provide customer RINs when given PII, such as a phone number or address, to maximize ease of customer use
- Utility records tying customer accounts to PII are often incorrect or outdated. As such, the QR code or RIN located on customer bills might be a more reliable solution
- If the tool does incorporate PII or actual usage data, offering a tool that is identically available for each LSE/UDC could minimize cybersecurity risks
- That being said, a federated approach might create logistical challenges and/or increase customer confusion

Tool development, operation, and maintenance

- The CCAs suggest a non-LSE third-party build, operate, and maintain the tool
 - Many CCAs don't have the bandwidth to directly support tool development or operation
 - Coordinating development efforts across LSEs would be difficult, time consuming, and expensive
 - A neutral third party ensures it doesn't favor any group of LSEs

Unbundled customer experience

- A seamless experience for unbundled customers would be ideal
- The tool will need to address the confusion over having to potentially pick delivery and generation rates separately