

DOCKETED	
Docket Number:	23-LMS-01
Project Title:	Load Management Standards Implementation
TN #:	256494
Document Title:	CleanPowerSF Cover Letter Submittal of Load Management Standards Plan
Description:	N/A
Filer:	Justin Strachan
Organization:	CleanPowerSF - SFPUC
Submitter Role:	Public Agency
Submission Date:	5/21/2024 2:42:51 PM
Docketed Date:	5/21/2024

May 21, 2024

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

Dear Mr. Bohan,

Pursuant to the California Code of Regulations, title 20 §1623.1(a)(3)(A), CleanPowerSF submits its Load Management Standards Plan (Plan) to the California Energy Commission Docket Number 23-LMS-01.

The San Francisco Public Utilities Commission (SFPUC) adopted the Plan in a duly noticed public meeting held on April 23, 2024.¹

If you have any questions please contact Justin Strachan at jstrachan@sfgatewater.org or Andrew Bevington at abevington@sfgatewater.org.

Sincerely,



Michael Hyams
Deputy Assistant General Manager, CleanPowerSF and Power Resources

London N. Breed
Mayor

Tim Paulson
President

Anthony Rivera
Vice President

Newsha K. Ajami
Commissioner

Kate H. Stacy
Commissioner

Dennis J. Herrera
General Manager

¹ SFPUC Resolution 24-0101 adopting the Plan is attached. The Plan was submitted to the SFPUC on March 26, 2024.

CleanPowerSF is a program of the San Francisco Public Utilities Commission (SFPUC), an enterprise department of the City and County of San Francisco.

CleanPowerSF is committed to protecting customer privacy. Learn more at cleanpowersf.org/privacy.

OUR MISSION: To provide our customers with high-quality, efficient and reliable water, power and sewer services in a manner that values environmental and community interests and sustains the resources entrusted to our care.



PUBLIC UTILITIES COMMISSION

City and County of San Francisco

RESOLUTION NO. 24-0101

WHEREAS, On January 20, 2023 in Docket Number 21-OIR-03 the California Energy Commission (Energy Commission) adopted Load Management Standards (CCR Title 20 §§ 1621-1625) that directed CleanPowerSF in addition to California's largest investor-owned utilities, publicly owned utilities, and community choice aggregators (CCAs) to develop a Load Management Standards Plan consistent with Energy Commission's standards; and

WHEREAS, Load management standards propose the development of electricity rates or load flexibility programs using price signals that could vary hourly or sub-hourly to better reflect the real time cost and environmental effects of electric generation; and

WHEREAS, The goals of the Load Management Standards are to encourage the use of electricity at off-peak hours, encourage the control of daily and seasonal peak loads to improve electric system efficiency and reliability, reduce or delay the need for new electrical capacity, and reduce fossil fuel consumption and greenhouse gas emissions; and

WHEREAS, The Energy Commission directed Large CCAs, which includes CleanPowerSF, to evaluate the development of hourly or sub-hourly real-time electricity rates based on specific criteria. If the Large CCA determines those criteria are not met, the Large CCA shall propose load flexibility programs using signals from the Energy Commission's Market Informed Demand Automation Server and evaluate them on the same criteria. These evaluations are to be included as part of a plan to be submitted for approval to the Commission, as the governing body of CleanPowerSF; and

WHEREAS, On March 26, 2024, CleanPowerSF submitted a draft Load Management Standards Plan to the Commission that is consistent with Section 1623.1 of the Load Management Standards regulations; and

WHEREAS, Despite CleanPowerSF's good faith efforts, developing real-time electricity rates or qualifying load flexibility programs would create a hardship, reduce system reliability, reduce safety and reduce efficiency; would not be technologically feasible, cost-effective or equitable; and would not materially reduce peak load; and

WHEREAS, CleanPowerSF's existing Time-of-Use rates and Peak Day Pricing program already provide comparable incentives for customers to manage their load; and

WHEREAS, CleanPowerSF will continue to evaluate the development of future real-time electricity rates and load flexibility programs, including programs that utilize the Energy Commission's Market Informed Demand Automation Server; and

WHEREAS, Nothing in the CleanPowerSF Load Management Standards Plan overrides or supersedes the Commission's authority as CleanPowerSF's governing and rate making body; and

WHEREAS, This action does not constitute a “project” under the California Environmental Quality Act Guidelines section 15378(a) because there would be no physical change in the environment; now, therefore, be it

RESOLVED, That the Commission adopts CleanPowerSF’s Load Management Standards Plan attached to this Resolution; and be it

FURTHER RESOLVED, That the Commission finds that, despite the good-faith efforts of CleanPowerSF, developing real-time electricity rates or load flexibility programs using signals that could vary hourly or sub-hourly would create a hardship, reduce system reliability, reduce safety and reduce efficiency; would not be technologically feasible, cost-effective or equitable; , and would not materially reduce peak load; and be it

FURTHER RESOLVED, That the Commission authorizes the General Manager, or the General Manager’s designee, to file the Approved CleanPowerSF Load Management Standards Plan with the Executive Director of the Energy Commission within 30 days of adoption, with any non-material changes or modifications to the exhibits, as may be acceptable to the General Manager.

I hereby certify that the foregoing resolution was adopted by the Public Utilities Commission at its meeting of April 23, 2024.


Secretary, Public Utilities Commission