

DOCKETED	
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Description:	N/A
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October 25, 2024

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

RE: San Diego Gas & Electric (SDG&E) Update Regarding Load Flexibility Programs and Rates (Docket No. 23-LMS-01)

Dear Mr. Bohan:

San Diego Gas & Electric Company (SDG&E) would like to provide an update in response to the Load Management Standards (LMS) provisions in section 1623(d) of the California Code of Regulations, which direct each Large IOU to provide a list of load flexibility programs deemed cost-effective by the IOU that also include automated response to MIDAS or other marginal signals.

SDG&E does not currently have any load flexibility programs that have been deemed cost-effective that also meet the parameters of having automated response to MIDAS or other similar signals.

However, SDG&E does have three *rate offerings* that are responsive to marginal prices. These three rates are neither subject to cost-effectiveness determinations by the California Public Utilities Commission (CPUC) nor by SDG&E. They are:

1. Critical Peak Pricing (currently integrated within MIDAS)
2. Vehicle Grid Integration Rate (will be integrated with MIDAS by 10/31/24)
3. Grid Integrated Rate (will be integrated with MIDAS by 10/31/24)

Thus, SDG&E has provided information in the requested Excel spreadsheet format on these three rates, uploaded to Docket No. 23-LMS-01.

In addition, SDG&E notes that, in December 2021, it submitted an application to the CPUC for a Real-Time Pricing (RTP) Pilot. SDG&E's application was dismissed by the CPUC, but further guidance and direction is anticipated in a forthcoming Decision in the CPUC's Demand Flexibility Order Instituting Rulemaking (DFOIR). SDG&E plans to submit a modified RTP Pilot application once the CPUC adopts a final Decision in the

DFOIR. SDG&E anticipates that the offering(s) made available as a result of the RTP application, if approved, would satisfy the criteria identified in the LMS Section 1623(d).

Please do not hesitate to contact me with any questions you may have.

Sincerely,

A handwritten signature in blue ink that reads "Sarah M. Taheri". The signature is written in a cursive, flowing style.

Sarah M. Taheri
Regulatory Affairs Manager