

**DOCKETED**

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<b>Project Title:</b>	Load Management Standards Implementation
<b>TN #:</b>	260116
<b>Document Title:</b>	Request for Comment on the Statewide Rate Tool
<b>Description:</b>	Request for Comment on the Load Serving Entities' October 1, 2024, Plan for a Single Statewide Rate Access Tool
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<b>Organization:</b>	California Energy Commission
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**CALIFORNIA ENERGY COMMISSION**

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CEC-70 (Revised 7/22)



## Load Management Standards Implementation

### Request for Comment on the Load Serving Entities' October 1, 2024, Plan for a Single Statewide Rate Access Tool

Docket No. 23-LMS-01

#### Background and Discussion

On October 1, 2024, on behalf of itself and the other load serving entities (LSEs) covered by the Load Management Standards (LMS) regulations (20 California Code of Regulations (CCR) section 1621, *et seq.*), San Diego Gas and Electric (SDG&E) filed three documents in the Load Management Standards' Implementation docket, 23-LMS-01. These documents, specifically identified below, comprise the LSEs' plan (plan) for developing the single statewide rate access tool as required by 20 CCR section 1623(c).

- [Single statewide rate tool LSE proposed framework](https://efiling.energy.ca.gov/GetDocument.aspx?tn=259404&DocumentContentId=95485) – TN# 259404  
(<https://efiling.energy.ca.gov/GetDocument.aspx?tn=259404&DocumentContentId=95485>)
- [Statewide rate tool LSE proposed concept](https://efiling.energy.ca.gov/GetDocument.aspx?tn=259403&DocumentContentId=95486) – TN# 259403  
(<https://efiling.energy.ca.gov/GetDocument.aspx?tn=259403&DocumentContentId=95486>)
- [Statewide rate tool LSE proposed terms and conditions](https://efiling.energy.ca.gov/GetDocument.aspx?tn=259402&DocumentContentId=95487) – TN# 259402  
(<https://efiling.energy.ca.gov/GetDocument.aspx?tn=259402&DocumentContentId=95487>)

Broadly, the single statewide rate access tool is a regulatory requirement to enable electricity customers or their authorized third-party agents to: 1. Look up the rate identification number(s) (RINs) that apply to the customers' premises; 2. Look up the RIN(s) corresponding to the rates that the customers are eligible to switch to; 3. Provide estimated average or annual bill amounts on the customers' current rates and rates they are eligible for; and, 4. Allow the customers or their authorized third parties to change the rate the customers are using.

Title 20 CCR section 1623(c) contains the regulatory requirements for the statewide rate access tool. [California Code of Regulations - § 1623. Load Management Tariff Standard](https://govt.westlaw.com/calregs/Document/I3DD8C7209D4311EDA65FDF2B31A571F6?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1)  
([https://govt.westlaw.com/calregs/Document/I3DD8C7209D4311EDA65FDF2B31A571F6?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)&bhcp=1](https://govt.westlaw.com/calregs/Document/I3DD8C7209D4311EDA65FDF2B31A571F6?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1))

#### Request for Comment

The California Energy Commission (CEC or Commission) staff requests comments on the LSEs' October 1, 2024, plan for the single statewide rate access tool. CEC staff is interested in comments on any aspect of the LSEs' plan, but specifically requests comments on the topics in Attachment A, below.

Please submit your comments to the LMS implementation docket by January 17, 2025.

### **Instructions for Commenting**

Written comments may be submitted to the Docket Unit by 5:00 p.m. on January 17, 2025. The CEC encourages the use of its electronic commenting system. Visit the e-commenting page for docket [23-LMS-01](https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=23-LMS-01) (<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=23-LMS-01>) at <https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=23-LMS-01>. Enter your contact information and a subject title that describes your comment. Comments may be included in the "Comment Text" box or attached as a downloadable, searchable document consistent with 20 CCR section 1208.1. The maximum file size allowed is 10 MB. Additional guidance can be found at [E-Filing and E-Commenting](https://www.energy.ca.gov/proceedings/e-filing-and-e-commenting) (<https://www.energy.ca.gov/proceedings/e-filing-and-e-commenting>).

Written comments, attachments, and associated contact information (including address, phone number, and email address) will become part of the public record of this proceeding with access available via any internet search engine.

Written comments may also be submitted by email. Please include docket number 23-LMS-01 and Load Management Standards Implementation in the subject line and email to [docket@energy.ca.gov](mailto:docket@energy.ca.gov).

Written comments may be submitted via mail when sent to:

California Energy Commission  
Docket Unit Docket No. 23-LMS-01  
715 P Street, MS-4  
Sacramento, California 95814

### **Contact Information**

For further information, please contact: Stefanie Wayland and the Load Management Standards office at [loadflex@energy.ca.gov](mailto:loadflex@energy.ca.gov).

DATED: November 15, 2024

## Attachment A

CEC staff has developed the following questions on the three statewide rate tool documents submitted by the LSEs on October 1, 2024. This list is not comprehensive. While staff is requesting responses to these questions, staff will review and consider all comments in planning next steps for the design and implementation of a statewide rate tool.

### Design

- 1) Please identify examples of other, similar software/tools that perform this kind of task. Specifically, please identify other software that authenticates a person as an eligible customer of a business that is different from the business querying the customer's information.
- 2) Do you support the statewide rate tool design as proposed by the LSEs in their October 1, 2024 filings? Why or why not? If not, what alternative architecture do you recommend?
- 3) What aspects of the LSEs' proposed design do you support, and think will work well? Why?
- 4) Do you recommend a different approach for sharing a customer's rate information with service providers that the customer explicitly authorizes?
- 5) How do you view the proposed ease of access for rate customers? Are there areas where ease of use could be improved or barriers reduced?
- 6) Should any additional customer information (e.g., historical interval meter data) be available through the statewide rate tool? If so, what? At what frequency should any additional data be available and at what frequency should it be updated? For example, "The statewide rate tool should include hourly meter data from the customer's meter and hourly distribution-level congestion measurement for the customer's meter. These data should be updated daily such that the previous day's data is always available."

### Authentication, customer authorization, privacy and security

- 7) What approach do you recommend for authentication? Single sign on, one time passcode, or something else?
- 8) What are the privacy and security concerns for the statewide rate tool? How should they be addressed?
- 9) How should service providers register to gain access to the statewide rate tool? What are appropriate and reasonable requirements for access (or reasons to deny access)? Are there examples that could be followed?
- 10) Does the LSEs' proposal appropriately address customer authorization? Why or why not? If not, what approaches do you recommend for ensuring the customer is authorizing the service provider to look up their rate information?

### Cost

- 11) How can the cost of development, deployment, and maintenance be reduced?
- 12) Roughly, what is the total cost you would expect for developing, implementing, and maintaining the statewide rate tool? What experience or examples do you base your estimate on?

### Terms and conditions

- 13) Do you support the terms and conditions in the LSEs' submission? If not, what changes would you recommend?

- 14) What are appropriate limitations or requirements for data sharing, retention, storage, and privacy?

### Usage and Governance

- 15) The load management standards put responsibility for building and maintaining the statewide rate tool with the utilities and CCAs. Is there a more efficient way to build the tool or achieve its goals?
- 16) How useful do you expect the tool to be to users, for example automation service providers? What are the most valuable use cases for the tool? Should costs be imposed on automation service providers to cover usage or for a service level agreement to help cover the cost of maintenance?
- 17) What should be the funding source for the development and maintenance of the tool?
- 18) Should the tool incorporate all initially envisioned features<sup>1</sup> or should the feature set be adjusted? For example, “Rate change capability is nice to have, but not required for my company’s load flexibility and VPP offerings. We would benefit more by having additional customer and grid data available through the tool.”
- 19) If the statewide rate tool is not developed, what effects do you expect this to have on automation service providers, electricity customers, and statewide adoption of load flexibility?
- 20) Do you have any concerns about equity or equal access? If so, how can these be addressed?

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<sup>1</sup> 1. Look up the rate identification number(s) (RINs) that apply to the customers’ premises; 2. Look up the RIN(s) corresponding to the rates that the customers are eligible to switch to; 3. Provide estimated average or annual bill amounts on the customers’ current rates and rates they are eligible for; and, 4. Allow the customers or their authorized third parties to change the rate the customers are using.