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GridX Comments on LSE Plan for SST

Additional submitted attachment is included below.

January 17, 2025

Load Management Standards Office

California Energy Commission

SUBJECT:

RE: Docket No. 23-LMS-01 – Request for Comment on the Load Serving Entities' October 1, 2024, Plan for a Single Statewide Rate Access Tool

To whom it concerns:

GridX, Inc. ("GridX") thanks the California Energy Commission ("CEC" or "the Commission") for the opportunity to provide written comments on the set of questions provided October 1, 2024, in Docket No. 23-LMS-01, which seek input on the "Load Serving Entities' ("LSE") Plan for a Single Statewide Rate Access Tool".

GridX is generally supportive of the LSEs' 'decentralized' approach to the Single Statewide Rate Access Tool ("SST"). GridX works with utilities across the U.S., including extensive experience in California and we strongly believe there are existing technologies capable of advancing Load Management Standards (LMS) objectives and maximizing SST cost effectiveness and impact. GridX has spent over ten years in the state integrating with utility systems to receive customer and meter data, providing a broad suite of customer-facing rate tools, and facilitating the deployment of Day-Ahead Hourly Real-Time Pricing and Vehicle-to-Grid Integration pilot rates including interaction with the Market Informed Data Automation Server ("MIDAS"). In fact, as a software provider to the CalFUSE/VGI dynamic pilots, GridX is prepared and able to upload RIN data to MIDAS daily. Modular, LSE-sited solutions, like those described above, are capable of fulfilling both basic rate and bill comparison requirements and also scaling to accommodate more complex, dynamic rate structures, and will be key drivers of SST success.

With these comments, we illustrate how utility rate engines and related customer empowerment tools might interact with the 'thin layer SST gateway' described in the Concept Design Document. We expand on the position of these tools within the SST

architecture as responses to a selection of the Commission's questions, according to the number indicated in the original request for comment, below.

GridX Responses

3. What aspects of the LSEs' proposed design do you support, and think will work well? Why?

GridX supports the objectives of the LSEs' proposed design and believes LSEs with existing rate engines should leverage the investments made in those for the SST. GridX suggests that, should Phase I of the SST implementation process demonstrate clear value, the Commission should then consider developing standards to guide bill comparison functionality by LSEs without such systems. We recommend that the Commission look to existing advanced rate engine implementations in the state as a model for development.

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?

Should Phase I of the SST implementation process demonstrate clear value, GridX believes providing access to a rate comparison tool through the SST is fundamentally a good idea. We also support personalized rate education to help customers understand the exact cost of their energy choices. By analyzing customers' actual AMI data, an effective rate engine can not only execute bill comparisons, but also perform "what if" analyses to help customers understand how adding certain technologies (e.g., electric vehicles, solar, batteries) would impact their utility bill and recommend the most beneficial rates based on these modifications.

Our research has shown that these types of personalized rate comparisons lead to greater engagement and rate enrollment. For example, a Northeast utility client noted that of the ~600 customers that opted into its new TOU rate each month throughout 2024, 80% accessed GridX rate comparison tools. Additionally, customers who switched rates interacted 10% more with the rate comparison tools than customers that did not switch rates. Customers who switched rates and accessed the tool saw higher savings

than customers that used the tool but did not switch rates, suggesting that customers are more likely to enroll in new rates when significant savings potential is communicated.

11. How can the cost of development, deployment, and maintenance be reduced?

GridX agrees with the CEC and LSEs' identification of the most effective approaches for minimizing development, deployment, and maintenance costs. Reusing existing technology that already meets the core requirements of the rate component of the SST is a smart and prudent strategy.

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?

Should Phase I of the SST implementation process demonstrate clear value, GridX believes rate comparison tools are valuable and can provide greater rate transparency to customers. We also emphasize the importance of understanding the impact of clean energy decisions. We therefore strongly advocate that any rate or bill comparison tool whose insights the SST may eventually grant access to should include features that allow users to fully grasp how adding technologies like EVs, batteries, solar, heat pumps, and others will affect their power usage and bills. Additionally, in many cases, these clean energy choices significantly influence the most suitable rate plan for the user.

18. Should the tool incorporate all initially envisioned features 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."

GridX supports the initial vision for the feature set of the rate comparison tool. Should implementation of the initial feature set prove valuable to users and customers, GridX believes that allowing the tool to surface "what-if" scenarios generated by

LSE-sited advanced rate engines has the potential to add significant value. These "what-if" scenarios, informed by a customer's historical interval usage data, enable simulations of a wide range of possibilities, including changes in customer behavior and the adoption of new technologies. In generating these scenarios, GridX enhances the rate comparison process, providing more context and expanding the user's understanding of how different actions could affect their energy costs. This approach puts more informational power in the hands of the end user, enabling them to make more informed decisions.

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?

GridX believes that providing robust rate and cost analysis tools to those considering enrollment is essential for ensuring the adoption of dynamic rates. GridX's mission revolves around empowering end users with rate transparency and a clear understanding of the bill impacts of their clean energy choices. Therefore, GridX emphasizes the importance of providing the kind of analysis envisioned for the SST, including tools to evaluate the impact of clean energy choices, to both potential customers and Automation Service Providers (ASPs). This aligns with GridX's perspective that a rate comparison tool should help users to fully understand the power and bill impacts of adding EVs, batteries, solar, heat pumps, etc., to their individual load profiles.

About GridX

GridX provides an Enterprise Rate Platform ("ERP") with a primary goal of accelerating decarbonization. Our client base of utilities across the U.S. represents 44 million smart meters and most of the largest residential rate transformation programs. GridX has supported utilities across the utility product lifecycle, including Marketing, Education and Outreach programs designed to increase customer awareness, adoption, and success with new time-varying rates. The ERP helps utilities achieve their clean energy goals by equipping them with analytical tools to design rates that meet regulatory, policy, and

financial objectives and tools for customers to comprehend the financial impact of their decisions related to clean energy. GridX aims to facilitate the implementation of rates that not only incentivize desirable customer behavior but also contribute to the enhancement of the grid.

GridX aims to assist utilities and other load serving entities in effectively marketing and increasing enrollment in new rates and programs. The GridX platform excels in promptly and accurately addressing significant billing and cost-related inquiries. In addition, the GridX platform can support utilities in developing and launching multiple rates, while providing unique and personalized insights to customers by leveraging their exact historic usage, and not a statistical sampling. GridX firmly believes that a crucial step in increasing customer uptake is enhancing customer satisfaction by aiding customers in comprehending the financial consequences of the choices available to them.

Conclusion

GridX appreciates consideration of these comments and looks forward to further engaging with the CEC and other stakeholders.

Sincerely,

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