

DOCKETED	
Docket Number:	23-LMS-01
Project Title:	Load Management Standards Implementation
TN #:	261138
Document Title:	Advanced Energy United Comments - Advanced Energy United's Comments on Questions Regarding Load Serving Entities' Plan for a Single Statewide Rate Access Tool
Description:	N/A
Filer:	System
Organization:	Advanced Energy United
Submitter Role:	Public
Submission Date:	1/17/2025 4:17:40 PM
Docketed Date:	1/17/2025

*Comment Received From: Advanced Energy United
Submitted On: 1/17/2025
Docket Number: 23-LMS-01*

**Advanced Energy United's Comments on Questions Regarding
Load Serving Entities' Plan for a Single Statewide Rate Access Tool**

Additional submitted attachment is included below.

January 17, 2024

Subject: Advanced Energy United's Comments on the California Energy Commission's Questions Regarding Load Serving Entities' October 1, 2024, Plan for a Single Statewide Rate Access Tool (Docket No. 23-LMS-01)

Dear Commissioners,

Introduction

Advanced Energy United (United) welcomes the opportunity to provide input on the California Energy Commission's (CEC) efforts to develop a Single Statewide Rate Access Tool (SST) as part of its Load Management Standards (LMS) initiative. As the only industry association representing the full spectrum of advanced energy technologies and services, United is uniquely positioned to contribute insights on how data access can empower customers, improve affordability, and drive progress towards California's climate goals.

This letter outlines United's vision for a centralized data access platform to achieve these critical policy objectives. We believe these goals necessitate integration of customer use data with rate access and rate change functionalities. These comments illustrate the drawbacks of continuing with a fragmented approach, summarize the benefits of integrating rate functionality with customer use data, and provide a vision for a more comprehensive data access platform.

Comprehensive Data Access is Foundational to the LMS Objectives

Load Management Standards are designed to promote customer affordability, reduce grid infrastructure costs, and help integrate renewables on the grid by aligning electricity use with generation and grid capacity using flexible demand devices. The LMS - if implemented effectively - could play a significant role in California achieving its 7,000 MW load flexibility target for 2030 and cost-effectively achieving its 2030 and 2045 clean energy goals. This is especially critical at a time when the state is also grappling with a major energy affordability crisis, with electricity rates for some utilities more than doubling in the last decade.¹ With

¹ *Assessing California's Climate Policies –Residential Electricity Rates in California* by the Legislative Analyst's Office ([link](#)).

distribution costs one of the most significant drivers of rate increases in recent and coming years, load flexibility is an essential cost reduction tool.²

Combining rate access and rate change with customer use data and analysis is foundational to the goals of load flexibility and energy affordability. Consumers, load serving entities (LSEs), and authorized third parties need seamless and reliable access to energy data and rate or program information to enroll, participate, and earn savings from both dynamic rates and customer programs. While the LSE's conceptual SST proposal would *link* rate information and the IOU's consumer energy use data, the linkages necessary to accomplish this each introduce points of failure and friction. The LSE's SST proposal relies on linkages to construct a simulacrum of integration. Instead, we propose that the CEC investigate a truly integrated energy data and rate platform.

Existing Paradigm & Current Challenges

The SST proposal risks perpetuating many of the problems that already plague the utilities' Share My Data and Connect My Data portals. Like those solutions, the proposed SST would not be a truly statewide tool and would instead be composed of fragmented, bespoke solutions. These bespoke solutions are prepared by each IOU within their unique IT environment, with limited and cumbersome access by customers, LSEs, and authorized third-parties. Like the SMD portals, the cost of building and operating the SST risks being opaque and inflated by duplication. The SST should instead endeavor to build a platform that addresses rather than exacerbates these issues:

- **Fragmentation & Silos:** Each utility has their own bespoke customer data access solution and each lacks consistent processes and requirements. Some utilities have multiple customer data access solutions to serve different types of stakeholder needs. Layers of duplicative solutions increase costs and the fragmented experience frustrates customers and authorized third parties who must expend significant resources to navigate unique processes across markets and even within a single market.
- **Outdated Authorization Process:** Each utility has a cumbersome and outdated authorization process which requires an excessive amount of time and effort from the customer to access and share their own data. This is in contrast to other industries (i.e. banking, healthcare etc.) that allow customers to easily and securely share their data everyday through 1-2 steps. Authorized third parties report that the authorization process alone can result in up to 50% attrition in customer enrollment.

² Figure 2.1: Trends in Electric Utility Rate Base from 2023 California Electric and Gas Utility Cost Report: AB 67 Report to the Governor and Legislature, California Public Utilities Commission, April 2024 ([link](#)).



- **Incomplete Data:** Lack of comprehensive coverage (e.g., no integrated CCA/IOU data, ability to access data across LSEs) limits usefulness. Customers must access data separately from different providers and analytics on the benefits of electrification are not available.
- **Lack of Standards:** The IOU's current customer usage data access solutions do not abide by the latest national standards and are not certified by the Green Button Alliance. Green Button standards serve the purpose of ensuring data access solutions are consistent across the country (supporting technology and business model development) and are iteratively updated to reflect modern processes and capabilities.
- **Inconsistent Reliability:** Each solution often has outages and does not consistently or reliably provide access to data. This is of particular concern for customers and third parties who need to settle in energy markets and must do so within a designated amount of time.
- **Accountability and Transparency:** Investor-owned utilities are tasked with developing and maintaining customer data tools, which in some instances go against their financial interests, with little transparency or accountability. Critically, information on costs of current and proposed tools is not currently available. Users of these tools have little to no recourse when faced with inaccurate and/or delayed data. Customers' right to easily access and share their own data are arguably infringed by utility gate-keeping. Moreover, there are no metrics tracking the performance of these tools.

Vision for a Comprehensive Statewide Data Access Platform

United envisions a statewide, centralized data access platform that addresses existing challenges in data accessibility and facilitates innovative energy solutions. This vision intends to integrate existing platforms with the SST, not duplicate them. Moreover, this platform would be treated as a critical and foundational set of infrastructure to enable and scale California's clean energy economy. This platform is intended to replace, not duplicate, existing and proposed tools like Green Button Connect's Share My Data and the LMS Single Statewide Tool. Specifically, the proposed platform would:

1. Provide consistent, secure access to billing, usage, and rate data for customers, utilities, and authorized third parties.
2. Be extendable to other types of energy data (e.g grid data) that would benefit from statewide consolidation in the future iterations
3. Serve as a one stop shop for different types of data for a broad set of stakeholders
4. Consolidate disparate data streams and platforms to enable analysis of savings opportunities and demand flexibility.
5. Leverage experience, best practices, and cost savings from existing and developing models in Texas, New York, Illinois, and New England to ensure privacy, security, and ease of use.



6. Enable equal- or lower-cost implementation and maintenance compared to the Green Button Connect (GBC) and LMS Rate Access tools.
7. Operate under a governance framework ensuring balanced representation from all stakeholders.

Potential Key Benefits

A comprehensive statewide, centralized data access platform could address issues with existing and proposed tools and potentially improve upon them.

- **Customer Empowerment:** Simplified access to a single source of actionable data enables customers to manage their energy costs effectively and has a secondary impact of helping manage California's grid.
- **Economies of Scale:** Consolidating data access in a single platform offsets redundant development at each utility/LSE, avoids the need for point solutions, and consolidates operational costs.
- **Uniform Market:** Creates one common market foundation (i.e. processes, interface etc.) to access data to deploy, utilize and scale clean energy solutions.
- **Jurisdictional Clarity:** A statewide platform can leverage non-utility data (such as income qualifications) and can include non-CPUC-regulated entities (such as public utilities) in a way not possible with IOU-specific platforms.
- **Consistency:** When there are parties that need to operate across utility service territories (such as multi-site commercial customers, statewide program implementers, community-based organizations, or DER aggregators), having a common method for accessing data is critical for successful operations.
- **Improved System Performance:** Utility data platforms experience high outage rates far above accepted IT standards, which is impacted by internal dependencies between these data platforms and other components of the utilities' IT systems.
- **Consolidated Identity Management:** Absent a consolidated platform, a single customer needing to share relevant data from different sources (such as utility, LSE, or state agency) would need to authenticate and authorize separately for each data source; introducing high friction to already difficult customer engagement.
- **Uncertainty and Dispute Reduction:** Having a common data access platform that is shared by all parties, including utilities, LSEs, customers, state agencies, and the ISO minimizes disputes around issues like eligibility and settlement.
- **Transparency and Representative Governance:** A consolidated platform with representative governance can more easily promote engagement from a diverse set of stakeholders, improve transparency, protect customer rights, and ensure accountability for performance.



Recommended Next Steps

Rather than move forward with the LSE's proposal, the CEC should instead take the following steps:

1. Host a Workshop to Gather Experience and Alternative Proposals

The CEC should host a workshop to explore alternative approaches to the current single statewide tool proposal. The workshop should include:

- a) **Experience from other jurisdictions** that have implemented or are currently designing more comprehensive data access platforms (like Texas, New York, and Illinois). Presenters could share lessons learned and best practices.
- b) **Proposals from stakeholders and experts** regarding modifications to the current SST proposal or alternative models. United would like the opportunity to present our vision for an integrated statewide data access platform and present more details regarding potential architecture, policy and governance, and costs and benefits. Other stakeholders, including solution providers, could present estimates regarding the capabilities and costs of the proposed SST as well as alternative models.

2. Explore Steps Towards More Comprehensive Vision

Following the workshop, the CEC should begin exploring the key steps it will need to take to pursue a more comprehensive approach to statewide data access. At a minimum, this process should include the following:

- a) **RFI:** The CEC should consider issuing a formal RFI with a broad list of objectives and a request that stakeholders submit conceptual designs along with cost estimates and timelines for design and implementation. This non-binding inquiry will provide critical data for evaluating potential alternatives.
- b) **Explore Scope of Authority:** The CEC should seek to better understand its options in updating the scope of the statewide tool. What can be done without additional rulemaking? What would trigger a reopening of the regulation? Where are there nexus with CPUC authorities? (This latter question should be detailed in collaboration with the CPUC, as recommended in (4) below)

3. Gather Costs for Existing Programs



The CEC should direct the utilities to provide the upfront and ongoing costs for their current customer data solutions as well as the estimated costs for implementing the SST. **This information is critical** to understanding the full costs of the current SST proposal in the broader cost context of data access in California, and critical to understanding the benefits of an integrated data access solution. We note these are far from “sunk costs”: for instance PG&E is currently requesting \$761.3 million for an upgraded billing system the scope of which includes a new customer data access solution.

Uncovering and tabulating current data access costs from multiple budgets and authorizations is a sizable task - and one reason why public transparency is hindered and CEC action is necessary. The CEC should direct the utilities to provide all relevant cost data, including from the following initiatives and decisions:

- Share my Data Platform Initial Deployments (September 19, 2013)
 - i. Decision 13-09-025: Decision Authorizing Provision of Customer Energy Data to Third Parties upon Customer Request
- Additional Demand Response Provider (DRP) Functionality (June 9, 2016)
 - i. Decision 16-06-008: Decision Addressing Budgets for Day-ahead, Real-time and Ancillary Services during the Intermediate Implementation Step of Third-party Demand Response Direct Participation
- Data Sharing enhancements for regional networks (May, 4 2023)
 - i. Advice No. 6140, 4214-E/3191-G, 4739-G/6930-E, 5027-E: Joint Authorization Request to Recover Infrastructure and Operation Costs Pursuant to Decision 23-02-002
- Adjustments to support CCA forecasting and settlement requirements (October, 11 2023)
 - i. R. 22-07-005: Order Instituting Rulemaking to Advance Demand Flexibility Through Electric Rates.
- Share My Data ‘Click through’ Process Enhancements (December 22, 2023)
 - i. Advice Letters 4813-G/7046-E, 5120-E, 4300- E/3239-G, 6207-G: Regarding the 2024 Cost of Capital Formula Adjustment Mechanism
- Rate Cases for each utility

4. Construct Vision for Transition

If it is determined that a statewide, centralized tool is more cost-effective than the utilities’ existing and proposed solutions, the CEC should work with stakeholders to



develop a proposed process for transitioning from utility-specific tools to a centralized platform. This roadmap should include milestones for stakeholder engagement, infrastructure development, and regulatory adjustments to ensure a smooth and efficient shift. It should also incorporate best practices from jurisdictions that have implemented or are designing similar statewide data access solutions. This vision document should also identify projected costs and funding streams.

5. Partner with CPUC to implement roadmap

The CPUC will play a critical role in developing and implementing this roadmap. United expects that this initiative will only succeed with support at the Commissioner level at both the CEC and CPUC. With Commissioner and agency leadership support, CEC staff and their CPUC counterparts should form an interagency working group to coordinate the various steps outlined in these recommendations, including exploring jurisdictional issues, gathering critical cost information, and developing and ultimately implementing the vision for transition to an integrated data access platform. The CEC and CPUC have a long history of such collaborative and productive staff working groups.

Responses to CEC's Specific Questions

United offers the following thoughts in response to the CEC's request for comments. Rather than address the LSE's proposal, United has provided its perspective on how these topics should be addressed in building a comprehensive statewide data access platform.

Design

United recommends the platform consolidate rate, usage, and billing data into a unified interface accessible via both APIs and a graphical user interface (GUI). Key features should include:

- **Rate Lookup and Comparison:** Provide customers and authorized agents with tools to compare rates, identify current Rate Identification Numbers (RINs), and estimate bill impacts in real-time.
- **Data Sharing:** Establish streamlined, secure processes for data sharing by leveraging best practices from sectors like banking and healthcare.
- **Reliability and Usability Standards:** Ensure the platform offers high uptime, low latency, and a user-friendly design to prevent enrollment drop-off and build customer trust.



- **Eliminate Fragmentation:** Replace siloed, utility-specific tools with an integrated system that provides consistent, reliable data across the state.

These features address barriers such as delayed or inaccurate data, fragmented systems, and inadequate tools for real-time rate comparisons, which hinder customer engagement and program participation.

The platform should include, at a minimum:

- **Customer Data:** Account information, billing details, interval usage data, and program/rate eligibility and participation.
- **Rate Data:** Tools for bill comparisons, rate evaluations, and rate changes (i.e., consistent with the full SST scope).
- **Historical Data:** At least one year of historical data to establish baselines and facilitate analysis of "counterfactual" scenarios for diverse customer types.
- **Granular Interval Data:** Access to 15-minute interval data for applications like Virtual Power Plants (VPPs) and demand response programs. Latency should not exceed one hour, as delayed data reduces usefulness (does not need to be billing quality).
- **Extendable to Other Data:** The platform should be designed such that it can be expanded in the future to other types of data (e.g grid data) that would benefit from being shared in a centralized and standardized manner

To improve adoption, the tool must be intuitive and user-centric, addressing human behavioral aspects such as awareness, ease of navigation, and clear guidance on how to use it effectively.

Authentication, Customer Authorization, Privacy and Security

Simplify Customer Authorization: Build on lessons from the CPUC’s “click-through process,” which has proven cumbersome and limits participation. Key improvements should include:

- Single Sign-On (SSO) and One-Time Passcodes (OTP) to simplify login and authorization. Critically, customers without online accounts should have a secure method for sharing and managing their data.
- Streamlined processes that eliminate unnecessary layers of authentication while maintaining robust privacy safeguards.
- An intuitive, customer-focused interface that empowers users to manage permissions directly.

User Categories for Data Access: Ensure the platform supports varying levels of access for different user types:



- LSEs and Contractors: Bulk data access for operational needs.
- Individual Customers: Direct access to their own data.
- Third Parties (e.g., DRPs, aggregators): Consented access to specific customer data.
- Researchers and Policymakers: Anonymized, aggregated data for planning and analysis.
- Regulators and DER Developers: Privileged access to grid-sensitive data for compliance and innovation.

Secure Data Transfer: Offer multiple options for secure data transfer (API, GUI, FTP, manual download) in standardized formats like CSV, XML, and JSON, with visualization tools where appropriate.

Cost

Centralizing the platform under the CEC's leadership would reduce redundancy, streamline implementation, and minimize ongoing operational costs. Key considerations include:

- **Cost Transparency:** A centralized and integrated tool would allow thorough and transparent end-to-end costs for the system.
- **Efficiency Gains:** Consolidation avoids duplicative development by utilities and CCAs, improving scalability for future needs.
- **Avoided Stranded Costs:** Preventing the utilities from spending additional ratepayer funds on an imperfect and incomplete system that will need to be updated and/or supplemented in the future.
- **Reduce future costs:** An integrated platform designed to be extensible to additional functionality in the future will reduce future costs.

Smart Meter Texas provides an example of potential cost benefits. SMT demonstrates the potential for scale, with 8.4 million meters and 659 service providers³ supported at a cost of \$6.8 million⁴ to \$8.7 million⁵ annually for maintenance and operations.

Usage and Governance

³ As of December 2024:

www.smartmetertexas.com/commonapi/getreport/reports/2024%20December%20Monthly%20SMT%20Reports.pdf.

⁴ 2024 estimate:

www.smartmetertexas.com/commonapi/getreport/reports/2024%20SMT%20Budget%20%20Report.pdf.

⁵ 2023 Actual expenditures:

www.smartmetertexas.com/commonapi/getreport/reports/2023%20SMT%20Actuals.pdf.



The platform's governance framework must balance stakeholder needs while maintaining transparency and accountability. Recommendations include:

- **Independent Governance Body:** Include representatives from utilities, CCAs, consumer advocates, underserved communities, and clean energy stakeholders to ensure equitable outcomes.
- **Performance Benchmarks:** Set standards for accessibility, security, uptime, and data accuracy with clear consequences for repeated service gaps or data errors.
- **Third-Party Management:** Engage an experienced third party to design, operate, and maintain the platform. This reduces bandwidth constraints for utilities and CCAs while ensuring consistent functionality and equitable access.
- **Transparency in Decision-Making:** Publish regular updates on platform performance, costs, and stakeholder engagement to maintain public trust.

Conclusion

United strongly supports the development of a centralized statewide data access platform as a critical step toward modernizing California's energy landscape. We encourage the CEC to prioritize timely implementation and stakeholder engagement to achieve its objectives.

We look forward to continued collaboration on this transformative initiative.

Sincerely,
/s/ Brian Turner

Brian Turner
Director
Advanced Energy United
Transforming Policy. Expanding Markets.
bturner@advancedenergyunited.org

