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Information Relevant to Demonstrating Good Faith Efforts to Meet LMS Program Goals

This section highlights information that can be relevant to determining whether a Large IOU's plan meets the requirements of the regulation and represents a good faith effort to meet LMS program goals. This list provided here is not intended to be exhaustive; nor are each of the elements listed here required for compliance. CEC staff may consider other information not listed here and may use discretion in deciding which information to consider and how to weigh it. CEC will document its decisions on the public record, including the LMS docket 23-LMS-01.

1. Marginal rate design and application -1623 (a)

   SDG&E Response to 1: Please see the attached for SDG&E's Real Time Pricing (RTP) Pilot Application.[1] This application was submitted to the California Public Utilities Commission (CPUC) on December 13, 2021. A final decision has not yet been issued, but the Proposed Decision, issued on September 25, 2023, proposes to dismiss the RTP application and relevant pilot rate without prejudice and requires SDG&E to file a new application for a RTP rate within 90 days of the issuance of a forthcoming decision in the Demand Flexibility Order Instituting Rulemaking (DFOIR), which is expected to provide guidance on dynamic rate applications.[2] And while SDG&E expects to refile an updated RTP application based on new guidance, SDG&E's original RTP pilot rate application and testimony in support thereof will likely provide the backbone of SDG&E's updated rate design and implementation of RTP rates. SDG&E's previous proposed RTP pilot rate is used extensively throughout this compliance plan as an example of a real time rate that will be further informed and modified after the DFOIR guidance.

   a) Rate design timeline

      SDG&E Response to 1(a): SDG&E expects to develop its RTP rate design beginning in Q4 of 2024 and file its real time pricing application at the CPUC in Q1 of 2025. This timeline is based on two assumptions: (1) that SDG&E will file 90 days from the proposed decision date to RTP rate application filing, as ordered in D.23-11-006,[3] and (2) that the DFOIR, Track B final decision is issued in Q4 of 2024. Currently, the proposed schedule for Track B of the DFOIR states that a proposed decision is expected in March 2024.[4] However, on April 24, 2024, the ALJ issued a Ruling related to Commission guidance on demand flexibility design and Commission support for the implementation of CEC LMS, which further clarifies that a proposed decision on those issues is expected in Q3 or Q4 of 2024.[5] Accordingly, for purposes of the discussion herein, SDG&E is assuming a final decision will be issued in Q4 of 2024. Please see the below estimated timeline.

Date	Action	Assumptions/Notes
Q3 2024	Proposed Decision on DFOIR Track B.	Assumption based on R.22-05-007, April 24 Ruling at Attachment A,

[1] A.21-12-006.
[2] A.21-12-006 et al., Proposed Decision Adopting Dynamic Rate Pilot and Dismissing Application for a Real Time Pricing Rate Pilot (filed September 25, 2023) at Ordering Paragraph 1.
[3] D.23-11-006, Ordering Paragraph 1 at 33-34. The assumption is that SDG&E will need the entire 90 days. Depending on the Track B Order and other circumstances, SDG&E may be able to file in fewer than 90 days.
[4] R.22-07-005, Assigned Commissioner's Phase 1 Scoping Memo and Ruling (November 2, 2022) at 9.
[5] R.22-07-005, Administrative Law Judge's Ruling on Track B Working Group 1 Proposals and Issue 5 (April 24, 2024) at Attachment A.

		which states that a PD is expected in Q3 or Q4 2024.
Q4 2024	Final Decision released, considered at CPUC Voting Meeting	Assumes a final decision is voted out in Q4 2024. CPUC voting meetings are 10/17, 11/7, 12/5 and 12/19.[6]
Q1 2025	SDG&E submits RTP application to CPUC	This assumes a final decision in Q4 2024. Pursuant to D.23-11-006, SDG&E has 90 days to file its RTP application.
Q1 2026	CPUC approval of SDG&E's RTP application	Assumes a final decision on SDG&E's application approximately 1 year from filing. The length of CPUC proceedings varies due to various circumstances, but SDG&E is estimating a one-year proceeding.
Q2/Q3 2026	SDG&E will consider and plans to apply to FERC for time-varying transmission energy rates provided that SDG&E determines that they are cost-effective, technologically feasible, and will not result in hardship. Considerations will include FERC's exclusive jurisdiction over transmission-rate design, disposition of similar applications submitted by other utilities, and prudent use of ratepayer funds to support exploration of time-varying transmission rates.	SDG&E will make this determination a reasonable amount of time after the relevant, above-referenced CPUC final decision in Track B of R.22-07-005, but not to exceed six months. The approval of FERC for SDG&E's time-varying transmission rate would be needed, subject to FERC's processes and procedural timelines.
Q1 2027	SDG&E RTP rates go live	Timeline from approval of RTP application to go-live for rate is approximately one year. This period includes requirements gathering, planning, development, and testing.

SDG&E emphasizes that it would be inappropriate for a state regulatory agency to premise LMS compliance on transmission-rate design that is subject to FERC's exclusive jurisdiction under federal law. Based on this timeline, and subject to having received all relevant regulatory approvals for rates that are subject to state law, SDG&E expects to meet the January 1, 2027, deadline for having LMS-compliant rates available. Additionally, given statewide electric affordability concerns (*see* Executive Order N-5-24), concurrent applications by each utility seeking a novel rate design that may be rejected may not be a prudent use of ratepayer resources.

[6] California Public Utilities Commission website, 2024 Voting Meetings (ca.gov), viewed 5/2/2024.

b) Rate application timeline

SDG&E Response to 1(b): Based on the information above, SDG&E expects to file an application in or around Q1 of 2025. The timing of SDG&E's filing is at least partially dependent on the timing of the CPUC's final decision in DFOIR.

c) Marginal rate design resource commitment

i. Resource commitment plan by year (0.5-4 years after effective date) that includes expected funding, contracts, and/or personnel
SDG&E Response to 1(c)(i): SDG&E Please see Prepared Supplemental Direct Testimony of Ray Utama (Chapter 4), specifically Section III at RU-10 – RU-14 for implementation costs.[7]

ii. Current resource commitment to date (this can be included in a table or graph with the plan by year)

SDG&E Response to 1(c)(ii): Per Ordering Paragraph (OP) 6 in CPUC Decision D.21-07-010, SDG&E created a RTP department that has been and will continue to work on all dynamic pricing issues. Currently, the department is staffed with a RTP Manager and a Business/Economics Analyst and further supported by the Customer Pricing team. For additional information on the approved resources discussed above, please refer to D.21-07-010.

d) Marginal cost-based rate design progress. Identify potential marginal cost rates and evaluate their compliance with 1623(a)(1)

SDG&E Response to 1(d): Discussion of SDG&E's progress toward designing potential marginal cost rates is included in the record on SDG&E's RTP Pilot application (A.21-12-006). As such, specific cross references are provided below for consistency.

i. Discussion of rate design intentions, considerations, and trade-offs

SDG&E Response to 1(d)(i): Please see Revised Prepared Supplemental Direct Testimony of Jeff DeTuri (Chapter 1) on Behalf of SDG&E, specifically Sections III-VII at JDT-14 – JDT-29.[8]

As initially proposed, SDG&E's RTP rates would be available to all customers in all required customer classes identified in the LMS. Depending on the CPUC's final decision in the DFOIR proceeding, as mentioned above, or any subsequent direction from the CPUC, SDG&E may modify its proposed rate design.

ii. Frequency

SDG&E Response to 1(d)(ii): Please see Revised Prepared Supplemental Direct Testimony of Jeff DeTuri (Chapter 1), specifically Section VI at JDT-24 – JDT-26 for the reasons for choosing day ahead hourly prices.[9]

[7] *See* A.21-12-006, May 15, 2023 Email Ruling on Motion to Receive Party Exhibits Into the Record at Attachment 2, Exhibit (Ex.) SDGE-04.
[8] *Id.* at Ex. SDG&E-01.
[9] *Id.*

iii. Proposed details about marginal capacity costs

SDG&E Response to 1(d)(iii): Please see Prepared Supplemental Direct Testimony of William G. Saxe (Chapter 3), specifically Section II.B at WS-5 – WS-6.[10]

iv. Proposed details about marginal energy costs

SDG&E Response to 1(d)(iv): Please see Prepared Supplemental Direct Testimony of William G. Saxe (Chapter 3), specifically Section II.A at WS-4 – WS-5.[11]

v. Proposed details about marginal transmission and distribution costs

SDG&E Response to 1(d)(v): Please see Prepared Supplemental Direct Testimony of William G. Saxe (Chapter 3), specifically Section IV at WS-7-8 for illustrative time differentiated transmission rates which were not used as part of the rate design for the proposed RTP application. These transmission rates were not included as part of SDG&E's proposed RTP rate design in A.21-12-006 because the Federal Energy Regulatory Commission (FERC), not the CPUC, has jurisdiction over the adoption of transmission rates. FERC has authority over the adoption of the revenue requirements recovered in transmission rates, including the retail rates adopted to recover those revenue requirements.

Based on the assumptions provided in response to Question 1. (b), SDG&E expects to file a new application in Q1 2025 with the CPUC to offer a dynamic pricing import pilot rate, for which SDG&E will consider proposing time-varying transmission energy rates for its dynamic pricing pilot. The process for obtaining FERC approval of time varying transmission energy rates would be for SDG&E to determine to file an application and then to submit the time-varying transmission energy rates to FERC through that application. FERC would then decide whether to adopt those rates, consistent with FERC's processes and precedent.

SDG&E anticipates it may need an extension for the distribution component depending on the guidance provided in the DFOIR. SDG&E has experience with circuit level distribution components through Schedules VGI and Public GIR rates, but those rates have limited eligibility and have resulted in difficulties that require constant monitoring for the impacted circuits, as explained below. SDG&E does not intend to expand these rates to more customer classes because this would require hourly monitoring of all of SDG&E's roughly 800 circuits at significant cost. SDG&E is considering non-circuit level distribution component design; however, because SDG&E expects the CPUC's DFOIR Track B decision to address dynamic rate applications and distribution components specifically, SDG&E cannot say for certain how and when a distribution component may be added.

A circuit level distribution component was not included in SDG&E's 2021 proposed RTP pilot rate because SDG&E experienced difficulty in implementing and billing the D-CPP

[10] *Id.* at Ex. SDGE-03.
[11] *Id.*

(distribution-critical peak pricing) rate component adopted for Schedules VGI and Public GIR. Those rates required pricing based on the customer's circuit assignment. There were two significant challenges SDG&E faced when implementing and billing the D-CPP rate component for Schedules VGI and Public GIR circuit assignments and customer fairness:

i. Circuit Assignments: This significantly complicated executing the appropriate pricing for each customer on these rates because each customer's circuit had to be tracked for CPP events and to confirm when each customer was on a particular circuit. The D-CPP adder is predicated on having accurate and updated circuit assignments, and certain customers may switch between circuits throughout the day based on grid operating conditions. Schedules VGI and Public GIR have very limited customer participation, yet SDG&E still experienced these issues. Applying a similar D-CPP rate component to dynamic pricing rate design would increase this circuit assignment issue since SDG&E would now need to follow and evaluate all circuits for every hour of every day.

ii. Customer Fairness: The D-CPP adder logic results in an uneven distribution of D-CPP events being called and applied due to high loads on circuits. On highly impacted circuits, customers can have more events called than on less impacted circuits. This imbalance of "called" D-CPP events can create a negative customer experience because not all customers on the same rate schedule are presented the same prices at the same time.

vi. Proposed details about other marginal costs

SDG&E Response to 1(d)(vi): SDG&E's original RTP application did not have any other marginal costs included, but there may be more details when the RTP application based on the DFOIR guidance is resubmitted. SDG&E can provide an update in its next report to the CEC.

vii. Proposed details about the fixed costs

SDG&E Response to 1(d)(vii): Please see Prepared Supplemental Direct Testimony of William G. Saxe (Chapter 3), specifically Section II.C at WS-6.[12]

viii. Customer class(es)

SDG&E Response to 1(d)(viii): Please see Prepared Supplemental Direct Testimony of Jeff DeTuri (Chapter 1), specifically JDT-11, line 21, which states that the RTP pilot will be available to all customer classes except streetlighting.[13]

e) Resource commitment to rate application and current progress

i. Resource commitment plan by year (0.5-4 years after effective date): funding, personnel

SDG&E Response to 1(e)(i): Please see Prepared Supplemental Direct Testimony of Ray Utama (Chapter 4), specifically Section III at RU-10 – RU-14 for implementation costs.[14]

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[12] *Id.*
[13] *Id.* at Ex. SDGE-01.
[14] *Id.* at Ex. SDG&E-04.

ii. Current resource commitment to-date

SDG&E Response to 1(e)(ii): Per OP 6 in D.21-07-010, SDG&E created a RTP department that has been and will continue to work on all dynamic pricing issues. Currently the department is staffed with two resources and further supported by other staff members within the organization.

f) Internal infrastructure development in support of marginal cost rates adoption

i. Billing system compatibility review and improvement plan and resource commitment:

A. Software

B. Hardware

C. Resource Commitment: funding and personnel

ii. Hourly marginal costs-based rates calculation system development plan and resource commitment:

A. Software

B. Hardware

C. Resource Commitment

SDG&E Response to 1(f): This will be developed as part of SDG&E's current billing system. For funding please see the response to 1.e.i. above, which provide numbers related to the previous RTP application.

2. 1623(b) Time-dependent rate submission to MIDAS via MIDAS Application Programming Interface (API)

a) Status of MIDAS submission for current time-dependent rates

Title 20 California Code of Regulations (CCR) sections 1623(b) and 1623.1(c) require each party subject to the Load Management Standards regulations (20 CCR section 1621, et seq.) to "upload its existing time-dependent rates applicable to its customers to the Commission's Market Informed Demand Automation Server (MIDAS) database".

This section was developed in an open, collaborative process and provides information to assist regulated parties in uploading non-time dependent rate modifiers to the California Energy Commission's (CEC) MIDAS database. The CEC is providing this resource to assist, streamline, and clarify the process by which regulated entities can comply with the regulatory upload requirements. Accordingly, the document discusses factors to consider in deciding which non-time dependent rate modifiers to upload to MIDAS in a technologically feasible, cost-effective way that complies with the regulation, and document these activities in the regulated parties' Load Management Standards (LMS) compliance plans. Another objective of this document is to ensure that electricity customers receive prices from MIDAS that closely reflect the price per kilowatt hour (kWh) that the customer is paying, while ensuring that the amount of data in MIDAS is not excessive, and that the number of rate identification numbers (RINs) uploaded to MIDAS by utilities is feasible and cost-effective.

SDG&E Load Management Standards Compliance Plan

With limited revisions in March 2025 to address CEC staff requests

Definitions:

Modifier / price modifier – A non-time-dependent volumetric adjustment to hourly electricity prices. In this document, the following modifier definitions are used:

> **Additive modifier** – A modifier that adjusts prices by adding a fixed amount (monetary) that does not change for a given customer on a given day.
>
> **Ratio modifier** – A modifier that adjusts prices by multiplying by a ratio (or percentage) that does not change for a given customer on a given day.
>
> **Fixed charge modifier** – A modifier that only affects the monthly fixed charge. These modifiers are not uploaded to MIDAS and need not be included in these considerations.
>
> **Tier modifier** – A modifier that only affects the allocation of electricity use into tiers. These modifiers are not uploaded to MIDAS and need not be included in these considerations.

RIN – Rate Identification Number, as defined in 1621(c)(13).

MIDAS – The Market Informed Demand Automation Server, administered by the CEC.

Notes:

1. Clarification: Non-time-dependent volumetric price modifiers to be excluded from MIDAS may be based on one or more criteria from the list of considerations below, or other relevant information specified in the compliance plan or annual report.
2. Each modifier is taken as a whole.
    a. For example, all customers enrolled in CARE would be summed to determine if the customer / annual load criteria are met.
    b. We do not recommend determining the number of customers on CARE for a specific rate, and then implementing the modifier for some rates and not for others.
3. When preparing the annual compliance plan updates, the utility may provide:
    a. The full list of price modifiers (including modifiers such as utility users tax and power charge indifference adjustment) with their modification amounts, number of customers on the modifier, and total load served to customers on that modifier.
    b. A table showing all of the rate modifiers for exclusion, with explanations and data in the format shown in Attachment [C].

Consideration 1 – Feasibility

The total number of RINs uploaded by a utility should be manageable and technologically feasible for both the regulated entity and MIDAS. Non-time dependent rate modifiers may be excluded from being uploaded to MIDAS based on infeasibility and the other considerations discussed herein.

Consideration 2 – User Communication

CEC and regulated parties should communicate to MIDAS users at the time of sign-up, and on MIDAS informational webpages, that MIDAS electricity price data are closely representative, but not precisely accurate depictions of their actual electricity rates. MIDAS electricity prices are designed to inform device operation decisions for the purposes of load flexibility, not to provide precisely accurate total energy cost calculations.

Consideration 3 – Modifier Exclusion

Non-time-dependent modifiers may be excluded from MIDAS uploads if:

a. The additional RIN(s) that would be created by including the modifier represents less than 0.5% of the total number of customers served by the utility AND less than 0.5% of total annual load as sales; or
b. The change in price due to the modifier is less than 0.01 $/kWh for additive modifiers OR 2% for ratio modifiers.

Consideration 4 – RIN Assignment

The LMS regulations require that customers who are enrolled in any time-dependent rate be assigned a RIN. The RIN should reflect:

a. The base rate that the customer is enrolled in, and
b. The price modifiers that the customer is enrolled in if those modifiers are included in MIDAS.

Consideration 5 – Modifier Review

Excluded modifiers should not cause problems with device operation, or for certain groups of customers (e.g., medical baseline, large industrial, etc.), especially where exclusion of the modifier may eliminate the group's participation in MIDAS. Modifiers should be reviewed for inclusion in MIDAS every year as part of the annual compliance update, or when major issues are reported by third parties, customers, or CEC staff.

i. List of current time-dependent rates and their RINs

SDGE Response to 2(a)(i): This information is available in Appendix C.

ii. Proof of rates availability on MIDAS (e.g., Large IOUs could attach MIDAS rate download file in JSON format and submit to LMS Implementation Docket 23-LMS-01)

SDGE Response to 2(a)(ii): The August 1 RINs were uploaded on 07/27/2023 between 3:00 AM and 1:00 PM PST and the October 1 rates were uploaded on 09/21/2023 between 6:00 AM and 9:30 AM PST. SDG&E's rate and hourly price information are currently publicly accessible on MIDAS via the MIDAS API at https://midasapi.energy.ca.gov/. Any party wanting to examine this information can do so by connecting to the API and downloading the relevant pricing information for SDG&E's rates.

iii. Composite rate calculation and submission solution

SDG&E Response to 2(a)(iii): To ensure compliance with the August 1st and October 1st deadlines, SDG&E utilized a manual approach of extracting the required pricing from its system and creating the required RINs. SDG&E used an appropriate validation process to ensure the pricing provided for the RINs was accurate and complete. Time-dependent UDC and Commodity Charges base rate RINs were uploaded on August 1, 2023. On October 1, 2023, SDG&E uploaded additional base rate RINs along with time-dependent rate modifier RINs, which include Critical Peak Pricing modifiers and discount modifiers (e.g., CARE, FERA, Medical Baseline, Food Bank, Economic Development Rate, etc.).

iv. Plan for ensuring accuracy and maintenance of current time-dependent rates

SDG&E Response to 2(a)(iv): SDG&E is currently using a manual process for creating and uploading RINs to the MIDAS server. This includes a test and review process to ensure accuracy of the uploaded RINs. SDG&E will continue to do this for upcoming rate changes until the solution is partially automated.

b) Plan and current progress of internal infrastructure upgrade for LMS compliant submission of current and future time-dependent rates, including hourly or sub-hourly marginal cost-based rates streaming process to MIDAS

SDG&E Response to 2(b): SDG&E will continue to manually upload RINs at least a day before the effective date of a rate or price change impacting RINs. SDG&E will continue design discussions towards a partially automated solution.

SDG&E along with Southern California Edison (SCE) and Pacific Gas and Electric (PG&E), collectively the Joint IOUs, filed a letter with the CEC on September 29, 2023, describing in detail the Joint IOU position on time varying rate modifiers as stated in the regulation. Also described in the letter is the infeasibility of including every rate modifier that affects time varying rates that would result in an unmanageable number of RINs. Without additional staffing and resources, SDG&E would not be able to comply with accurate numbers. Full automation is also not possible due to the complexities of more rates and rate modifiers being added and altered. Further, because rate design is never frozen, maintaining the MIDAS uploads requires regular monitoring, which will only become more difficult and time consuming the larger the number of uploaded RIN permutations.

3. 1623(c)(4) Plan to provide RIN(s) on customer billing statements and online account using both text and QR code
   a) Implementation plan with timeline

   SDG&E Response to 3a: SDG&E has begun designing the system changes required for the new text and QR code that were included in bills effective April 1, 2024. Based upon its assessment, these changes include the following processes:

   1. System integration changes to support receiving a separate RIN for Energy Service Providers (CCA/DA)
   2. Changes to SDG&E's bill layout to incorporate the text and QR codes, which include the RIN.

The current timeline for making these changes is estimated as follows:

Q3/Q4 2023 – Design/development of changes for the processes
Q1 2024 – Testing and validation of changes for the processes
Q2 2024 – Deployment and stabilization of changes for the processes

b) Billing system update plan and current progress

SDG&E Response to 3b: Please see response to question 3a above.

c) Proposed text design and QR code design and proposed placement on billing statements

SDG&E Response to 3c: SDG&E will work with the Energy Service Provider(s) in our service area on the method for displaying QR codes on bills. Ultimately, the bill design must be approved by the CPUC.

d) QR Code linked webpage (if any)
   i. Timeline for webpage creation and finalization
   ii. Webpage objectives
   iii. Proposed contents
   iv. As a potential channel for public information program per 1623(d)(3), considerations and/or plans, if any, to include LMS-compliant programs and/or rates available for the customer to encourage enrollment.

SDG&E Response to 3d: SDG&E's QR codes will include directly readable RINs and will not link to a webpage.

4. 1623(c)(1)-(3) Plans and current participation in the development of Single Statewide RIN Access Tool
   a) Resource commitment
      i. Resource commitment to the tool working group: funding, contracts, personnel

      SDG&E Response to 4(a)(i): SDG&E has volunteered to be on the development committee and participated in the September 20th meeting, which was the first meeting on the single statewide tool. SDG&E plans to actively participate in subsequent meetings as they are scheduled. The RTP department as described in Section 1.e.ii. will be leading SDG&E's involvement in the development of the tool.

      SDG&E has been working with the other regulated load serving entities (LSEs) on creating the statewide RIN tool compliant with 20 CCR Section 1623(c). A proposed plan for the tool was submitted to the CEC for review on October 1, 2024. We will continue to work with the other LSEs and the CEC to implement and maintain the statewide RIN tool in a timely manner subject to the tool's approval by the Commission.

      ii. Resource plan for development of the tool

      SDG&E Response to 4(a)(ii): It is premature to have a detailed plan for resources needed to develop the tool. SDG&E envisions it will include multiple departments spanning billing, rates, marketing and information technology to name a few.

      iii. Resource commitment and plan for implementation of the tool:

A. Funding plan

SDG&E Response to 4(a)(iii)(A): SDG&E as part of the DFOIR WG2 Joint IOU proposal has asked the CPUC for cost recovery for MIDAS related costs which include the Single Statewide RIN Access Tool.

B. Utility's review and identification of its internal infrastructure needs

SDG&E Response to 4(a)(iii)(B): It is premature to detail what the internal infrastructure needs will be given that it is still unknown how the single statewide tool will interact with SDG&E's systems.

C. Plans to address infrastructure needs identified in item B directly above

SDG&E Response to 4(a)(iii)(C): Once SDG&E has more clarity on how the statewide tool will interact with SDG&E's systems, a plan will be developed to address gaps/needs. Additional information will be provided in future reports to the CEC.

5. 1623(d)(1)-(2) List of cost-effective, LMS-compliant programs and rates
   a) Marginal Cost Rates
      i. Supplemental information regarding marginal cost rates not included in section 1, above (anything regarding proposed rates: rates structure, target customer classes, rate application status)
      ii. Enrollment targets, and projections

   SDG&E Response to 5(a): Please see SDG&E's response to 1. above.

   b) Hourly-MIDAS signals-based load flexibility programs
      i. Description of current and/or proposed programs:
         A. types of hourly MIDAS signals
         B. target end-uses/customers
         C. equipment requirements
         D. participating third-party automation service providers, if applicable
         E. control algorithms
         F. enrollment – current and projections
         G. load impact projections

   SDG&E Response to 5(b): SDG&E plans to create a dynamic pricing rate which will be uploaded into MIDAS as outlined in SDG&E's response to 1. above. Should LMS-compliant rates not be available by the timeline outlined in the regulation, SDG&E will provide a list of programs as directed in the LMS regulation.

6. 1623(d)(3) Plan for conducting public information program

SDG&E Response to 6: SDG&E incorporates public and customer information and outreach on new and/or changing rates as part of our standard business practices. For additional specificity on SDG&E's

approach, please see Prepared Supplemental Direct Testimony of April Bernhardt (Chapter 5), Education and Outreach for all responses to a, b, and c below.[15] Specific cross-references are included for ease of reference.

a) Public Information Program details on informing and educating customers.
   i. Why marginal cost-based rates and automation are needed
   ii. How the rates will be used
   iii. How these rates can save the customer money

   SDG&E Response to 6(a): Please see Prepared Supplemental Direct Testimony of April Bernhardt, specifically Section II.1.b at AB-2.

b) Public Information Program:
   i. Dissemination medium
   ii. Outreach targets and scale
   iii. Partners

   SDG&E Response to 6(b): Please see Prepared Supplemental Direct Testimony of April Bernhardt, specifically Section II.4 at AB-5 – AB-6.

c) Resource commitment plan to design and implement the public information programs:
   i. Funding
   ii. Contracts
   iii. Personnel

   SDG&E Response to 6(c): Please see Prepared Supplemental Direct Testimony of April Bernhardt, specifically Section III. at AB-12.

[15] *Id.* at SDGE-05.

Appendix A:
SDG&E Second Progress Report on Uploading Hourly Dynamic Pricing Rates into the MIDAS Database

On behalf of SDG&E, please find below an update provided in response to the California Energy Commission's adopted Order No. 23-0531-10 ("Order") regarding the Joint Parties' Request for Delay of July 1, 2023, MIDAS Rate Upload Deadline. Ordering Paragraph 3 states:

> SDG&E shall upload hourly dynamic prices offered through its Vehicle-Grid Integration (VGI) rate and Grid Integrated Rate (GIR) by April 1, 2024. SDG&E shall file reports of its progress towards meeting this deadline with CEC staff on July 1, 2023, October 1, 2023, January 1, 2024, and April 1, 2024.

Accordingly, SDG&E is providing an update on the progress of its work toward developing an automated system to support the upload of hourly dynamic pricing rates, include its VGI and GIR rates, by April 1, 2024.

- SDG&E continues to engage in the CEC's LMS MIDAS Working Group meetings, in which issues to support implementation of MIDAS are being resolved.
- SDG&E established an internal project team and secured the services of a consultant to support the development of a partially automated method to upload data.
- SDG&E has uploaded information in MIDAS to comply with the August 1 and October 1, 2023, deadlines and plans to upload additional time-dependent RINs as they become approved. For August, SDG&E uploaded 138 RINs, which represents SDG&E base rates without modifiers. For October, SDG&E uploaded an additional 196 RINs, which constitute time-dependent modifiers for SDG&E's Critical Peak Pricing (CPP) events and will require continual uploads when CPP events occur.
- In December, SDG&E plans to upload an additional 740 RINs related to implementation of the Solar Billing Plan.
- In April 2024, SDG&E will upload additional RINs for Grid Integrated Rate (GIR) and Vehicle-Grid Integration (VGI) rates, per the CEC granted extension request. SDG&E is currently using a manual process to create and support these RIN uploads.
- Moreover, in addition to the time-dependent modifiers being uploaded pursuant to the LMS regulations, in the spirit of collaboration and in an effort to provide more RINs for use in MIDAS, SDG&E has already uploaded 308 RINs related to its discounted programs and plans to upload 828 RINs related to the new Modified CAM line item.
- SDG&E agrees with SCE and PG&E on the complexities of stacking rate modifiers to develop RINs. And while SDG&E has fewer CCAs and franchise fee modifiers, which results in fewer RINs, it is still an unmanageable number of RINS. Without additional staffing and resources, SDG&E would not be able to provide accurate numbers.
- Additionally, full automation is not possible due to the complexities of more rates and rate modifiers being added and altered. Further, because rate design is never frozen, maintaining the MIDAS uploads requires regular monitoring, which will only become more difficult and time consuming the larger the number of uploaded RIN permutations.

SDG&E will provide another update on January 1, 2024.

Appendix B:
Considerations for Uploading Non-Time-Dependent Rate Modifiers to MIDAS

Please see separately submitted Excel Spreadsheet to Docket 23-LMS-01.