

**DOCKETED**

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**SCE Comments on Commissioner Workshop on Scope of Load Management Rulemaking**

*Additional submitted attachment is included below.*



**Catherine Hackney**  
Director, Regulatory Affairs

January 24, 2019

California Energy Commission  
Docket Office, MS-4  
Re: Docket No. 19-OIR-01  
1516 Ninth Street  
Sacramento, CA 95814-5512  
docket@energy.ca.gov

Re: Southern California Edison Company's Comments on the California Energy Commission  
Docket No. 19-OIR-01: Commissioner Workshop on Scope of Load Management  
Rulemaking

Dear Commissioners:

On January 14, 2020, the California Energy Commission (CEC) conducted the *Commissioner Workshop on Scope of Load Management Rulemaking* (Workshop) as part of the *2020 Load Management Rulemaking* (Rulemaking). After a brief introduction to the CEC's load management standards, representatives from government agencies, utilities, and other stakeholder organizations delivered presentations and participated in panel discussions regarding creating, communicating, and responding to hourly and sub-hourly grid signals. Southern California Edison (SCE) thanks the CEC for conducting the Workshop and appreciates the opportunity to engage with the CEC and other stakeholders on the Rulemaking.

Electric load management is an important tool for decarbonizing the economy. In *Pathway 2045*,<sup>1</sup> SCE maps out a feasible and cost-effective path to meeting California's long-term decarbonization goals, which relies on electrifying transportation and buildings while continuing to clean the electricity sector. Serving the additional electricity demand from the transportation and buildings sectors will require 80 gigawatts (GW) of new utility-scale clean generation capacity and an additional 30 GW of new distributed generation capacity over the next 25 years. Optimizing the amount and timing of electricity demand enables efficient utilization of intermittent clean energy resources, while also minimizing costs and ensuring reliability.

SCE supports the CEC's holistic approach to the Rulemaking, as described in the draft scoping memo.<sup>2</sup> The proposed scope includes a broad set of load management strategies such as tariffs, automation and storage technologies, and energy efficiency measures. While exploring

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<sup>1</sup> For more information on *Pathway 2045*, please visit <https://www.edison.com/home/our-perspective/pathway-2045.html>.

<sup>2</sup> This refers to the *DRAFT Load Management Rulemaking Scoping Memo* submitted to the docket (19-OIR-01) on January 10, 2020.

January 24, 2019

these strategies, SCE encourages the CEC to coordinate with relevant ongoing programs and ratemaking efforts, including utility demand response programs, the Self-Generation Incentive Program (SGIP), and the California Public Utilities Commission's Vehicle-Grid Integration Working Group.

SCE also appreciates the CEC's focus on equity. It is important to ensure the benefits and costs of any load management standards developed in the Rulemaking are distributed fairly among the various impacted entities.

Finally, SCE recommends the CEC include the following two items in the scope of the Rulemaking:

- Addressing cybersecurity concerns: The load management strategies within the scope of the Rulemaking may introduce cybersecurity risks that should be thoroughly examined before incorporating them into any load management standards.
- Ensuring customer choice: Any load management standards developed in the Rulemaking should maintain an appropriate level of customer choice regarding tariffs, technologies, and programs. Providing a robust suite of options for participating in load management strategies will ensure customer acceptance while also encouraging competition and innovation among technology and service providers.

SCE thanks the CEC for consideration of the above comments and looks forward to its continued partnership with stakeholders throughout the Rulemaking. Please do not hesitate to contact me at (916) 441-3979 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Very truly yours,

/s/

Catherine Hackney