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**SCPPA Comments on Draft Amendments to the Load Management
Tariff Standard**

Additional submitted attachment is included below.



March 16, 2020 | Submitted Electronically

California Energy Commission
Docket Unit, MS-4
Docket No. 19-OIR-01
1516 9th Street
Sacramento, CA 95814

RE: SCPPA Comments on the Draft Amendments to the Load Management Tariff Standard [Docket #19-OIR-01]

The Southern California Public Power Authority (SCPPA) thanks the California Energy Commission (CEC) for the opportunity to comment on concerns with the Draft Amendments to the Load Management Tariff Standard (Draft Standard).

SCPPA is a joint powers agency whose Members include the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles, Pasadena, Riverside, and Vernon, and the Imperial Irrigation District. Each Member owns and operates a Publicly-Owned Utility (POU) governed by a board of local officials. Our Members collectively serve nearly five million people throughout Southern California, and are striving to meet or exceed the State's ambitious energy and GHG emissions reduction goals.

Ratemaking Authority

SCPPA is concerned about §1623(d) language in the Draft Standard which suggests CEC is a rate-approving body. This concern was raised at the March 2, 2020 workshop; thankfully CEC staff clarified that it was not their intent to claim ratemaking authority but rather only to collect rates, after the rates have been approved by local POU governing boards. SCPPA's concern would be addressed if CEC explicitly clarifies language that CEC only intends to collect information about locally-approved rates.

Timing of Real-Time Tariffs

SCPPA also has concerns about the Draft Standard implementation timeline of a real-time tariff by 2022 and universal tariff by 2023 in §1623(b). This timeline will be difficult for Load Serving Entities (LSEs) to successfully adopt and appropriately inform customers. LSEs need more time to strategize how to effectively outreach to customers to inform them of dynamic changes to energy prices, and provide recommendations for how customers can optimize their consumer behavior to avoid surges in utility bills. Vulnerable populations, such as low-income customers, are at risk should unexpectedly higher utility bills leave them without adequate lead time to adjust their energy habits. Additionally, some customers who rely upon electronic bill payment are less aware month to month about how much they are paying in utility bills. These concerns were also raised at the January 14, 2020 and March 2, 2020 workshops.

Maintaining Current Scope of Utilities

Lastly, SCPPA encourages that CEC maintain its current scope of including the five largest utilities in this regulation. Smaller POUs already have fewer resources to dedicate to implementing a real-time tariff than the five largest utilities, in addition to facing the above stated challenges of an aggressive implementation timeline.

Conclusion

SCPPA hopes that CEC staff will consider these additional recommendations to the Draft Standard in order to achieve mutually agreeable solutions. Thank you for your time and attention to these matters.

Respectfully submitted,



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