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NRDC Comments on Load Management Standards

Additional submitted attachment is included below.

**Comments of the Natural Resources Defense Council (NRDC)
on the Load Management Rulemaking 15-Day Language (July 2022)**

Docket Number 21-OIR-03

July 20, 2022

Submitted by: Pierre Delforge, NRDC

The Natural Resources Defense Council (NRDC) appreciates the opportunity to comment on the fifteen-day language (July 2022) of the load management rulemaking. NRDC is a non-profit membership organization with more than 95,000 California members who is advocating for affordable and equitable building decarbonization and clean air policies to help mitigate the climate crisis.

California has set ambitious goals to reduce greenhouse gas emissions across all economic sectors and achieve carbon neutrality by 2045. Load management is a critical tool to achieve this goal by helping match electricity demand with the supply of clean, renewable and affordable energy. It is an essential strategy for the decarbonization of California's buildings, by reducing greenhouse gas (GHG) emissions, improving grid reliability, and reducing the cost of clean energy services. By increasing the efficient use of the electricity grid, load management can put downward pressure on electric rates, helping make clean energy more affordable and accessible for everyone, as well as directly reduce electric bills by enabling customer access to lower-cost electricity at times when grid marginal costs are low.

NRDC therefore fully supports the proposed Load Management standards to form the foundation for a statewide system that automates the creation of hourly and sub-hourly costs or signals that can be used by end-use automation to provide real-time demand flexibility on the grid.

NRDC appreciates the opportunity to provide comments on the load management rulemaking and look forward to the adoption of the proposed regulatory language.

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