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Document Title:	Response to CEC Staff Determination for LMS Extension
Description:	PG&E's response to the Staff Determination for Joint Parties LMS Extension Request.
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Organization:	Pacific Gas and Electric Company
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California Energy Commission Docket Office, MS-4 Docket No 23-LMS-01 1516 Ninth Street Sacramento, CA 95814

RE: Pacific Gas and Electric Company Comments on Initial Determination and Recommendation of the Executive Director on Joint Parties' Request for Extension on Uploading Time-Dependent Rates into the MIDAS Database (Docket No. 23-LMS-01)

Dear Commissioners:

Pacific Gas and Electric Company (PG&E) appreciates the California Energy Commission (CEC) for considering the request from Joint Parties¹ filed on April 28, 2023, to extend the deadline to upload time-dependent rates per the requirements of the Load Management Standards (LMS) Regulation by granting parties a one-month extension. PG&E supports the goals of the LMS Regulation to develop automated demand flexibility and more dynamic rates to help meet the State's climate goals while also balancing grid reliability.

PG&E will make its best faith effort to comply with the LMS requirements in the interim while we continue to work on developing an automated process for future uploads to the CEC's Market-Informed Demand Automation Server (MIDAS) Database. PG&E looks forward to the finalization of relevant requirements and documentation from the CEC that will aid PG&E and other load-serving entities in the development of such an automated process.

Should complications with the initial manual upload process occur, PG&E will make efforts to remedy the issues quickly while communicating and working closely with CEC staff.

Sincerely,

Jennifer Privett State Agency Relations

¹ The other parties include: Southern California Electric Company (SCE), San Diego Gas & Electric Company (SDG&E), Clean Power Alliance of Southern California (CPA), East Bay Community Energy (EBCE), Marin Clean Energy (MCE), Central Coast Community Energy (CCCE), Silicon Valley Clean Energy Authority (SVCE), San Jose Clean Energy (SJCE), Peninsula Clean Energy Authority (PCE), CleanPowerSF (CPSF), Sonoma Clean Power Authority (SCP), San Diego Community Power (SDCP), Pioneer Community Energy (Pioneer), Valley Clean Energy (VCE), and Orange County Power Authority (OCPA).