

<b>DOCKETED</b>	
<b>Docket Number:</b>	23-LMS-01
<b>Project Title:</b>	Load Management Standards Implementation
<b>TN #:</b>	254282
<b>Document Title:</b>	CalCCA Comments on LMS Implementation WS
<b>Description:</b>	CalCCA Comments on LMS Implementation WS
<b>Filer:</b>	Shawn-Dai Linderman
<b>Organization:</b>	CALIFORNIA COMMUNITY CHOICE ASSOCIATION
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	1/31/2024 4:42:11 PM
<b>Docketed Date:</b>	1/31/2024

**STATE OF CALIFORNIA  
CALIFORNIA ENERGY COMMISSION**

In the Matter of:

Load Management Standards  
Implementation Status

Docket No. 23-LMS-01

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS ON THE  
WORKSHOP ON LOAD MANAGEMENT STANDARDS IMPLEMENTATION**

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January 31, 2024

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The California Community Choice Association<sup>1</sup> (CalCCA) submits these comments on the *Commissioner Workshop on Load Management Standards Implementation*, held January 17, 2024 (Workshop).<sup>2</sup> The Workshop provided excellent updates regarding load management and demand flexibility proceedings at the California Energy Commission (CEC) and California Public Utilities Commission (CPUC). In addition, presentations were made regarding progress by the load serving entities (LSEs) and automated service providers (ASPs) towards tools necessary for customers to manage their loads based on time-varying rates, including development of the Single Statewide Rate Access Tool (Statewide Tool). What became clear

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<sup>1</sup> California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert Community Energy, Energy For Palmdale's Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

<sup>2</sup> The Commission issued its Notice of Commissioner Workshop on Load Management Standards Implementation on December 22, 2023, inviting parties to submit comments on the workshop on January 31, 2024.

from the Workshop is that the development of the Statewide Tool will continue to require significant attention from all parties to ensure its effectiveness.

As the October 1, 2024, deadline for parties to submit a plan for the Statewide Tool quickly approaches, CalCCA urges the Commission to convene working groups and/or workshops with Commission Staff, LSEs, ASPs, and other interested parties to encourage collaboration and innovation for the Statewide Tool. Without adopting additional and focused processes to help the parties understand the requirements and goals of the tool, it is unlikely that all parties will be able to agree on the Statewide Tool's structure. Any such working groups and/or workshops should begin as soon as possible to leave sufficient time for proposal development.

CalCCA provides the following subject areas that can be addressed during Statewide Tool working groups/workshops:

- How the Statewide Tool will integrate with the Market Informed Demand Automation Server (MIDAS) and the price machine being considered by the CPUC for integration of dynamic rates;
- Barriers and/or or open questions regarding the Statewide Tool's rate comparison and change features, including:
  - How to address different LSE's treatment of rate modifiers in MIDAS; and
  - How to integrate existing rate change processes and comparison tools.
- Cybersecurity measures and the treatment of personally identifiable information;
- Cost recovery for tool development, operation, and maintenance;
- Processes for vendor selection for tool development, operation, and maintenance; and
- How to ensure a seamless customer experience for both unbundled and bundled customers.

CalCCA looks forward to further collaboration on this topic.

Respectfully submitted,

/s/ Leanne Bober

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January 31, 2024