

2008 Order Instituting Informational
Proceeding on Rulemaking on
Load Management Standards

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Docket No. 08-DR-01
NOTICE OF EFFECIENCY
COMMITTEE WORKSHOP

Comments
of the
California Municipal Utilities Association

The Commission is currently holding workshops on advanced metering. We believe there are some important issues for the CEC to keep in mind as it considers the development of standards:

1. California's publicly owned utilities (POUs) vary greatly in size. Some are extremely small. Congress recognized this fact when it passed the Energy Policy Act of 2005 amendments to Title I of the Public Utilities Regulatory Policies Act of 1978 (§§ 111(d) & 112(b)) by including different requirements for utilities with total retail sales under 500 million kilowatt hours. We urge the Commission to also include flexibility for smaller utilities in California.
2. Many POUs have already begun their efforts to develop advanced metering systems. We urge the Commission to insure that any standards developed do not work in a counterproductive manner with those efforts or in the alternative to provide some form of "grandfathering" for programs which are already developed or in the design stages. Clarification of this position early would be beneficial in preventing utilities from stalling their current projects in this area.

Thank you for the opportunity to comment on these issues. We look forward to working with the commission as the workshops continue.

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