

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6851E
As of October 1, 2024

Subject: San Diego Gas & Electric Company, Southern California Edison Company, Pacific Gas & Electric Company Audit Process Recommendations for Selected Demand Response Customers, Pursuant to Decision 22-12-004

Division Assigned: Energy

Date Filed: 01-30-2023

Date to Calendar: 02-03-2023

Authorizing Documents: D2112004

Disposition:	Signed
Effective Date:	09-12-2024

Resolution Required: Yes

Resolution Number: E-5321

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Thomas Creager

858-654-1542

TCreager@sdge.com

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov



Clay Faber - Director
Regulatory Affairs
8330 Century Park Court
San Diego, CA 92123
cfaber@sdge.com

January 30, 2023

**Advice Letter 4161-E
(San Diego Gas & Electric Company ID U 902 E)**

**Advice Letter 4973-E
(Southern California Edison Company ID U 338 E)**

**Advice Letter 6851-E
(Pacific Gas and Electric Company ID U 39 E)**

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Subject: San Diego Gas & Electric Company, Southern California Edison Company, Pacific Gas & Electric Company Audit Process Recommendations for Selected Demand Response Customers, Pursuant to Decision 22-12-004

PURPOSE

Pursuant to Ordering Paragraph (OP) 3 of California Public Utilities Commission (CPUC or Commission) Decision (D.) 22-12-004 (the Decision), San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE), and Pacific Gas and Electric Company (PG&E) (collectively, the IOUs) respectfully submit this joint Advice Letter, recommending a process for demand response (DR) customers selected to be audited and monitored as part of the Commission's DR Prohibited Resources (PR) Policy Verification Plan (PR Verification Plan) to request monitoring of their PR through an on-board meter.

BACKGROUND

Pursuant to OP 37 of Resolution E-4906, on October 19, 2018, PG&E, SDG&E, and SCE each filed an application to allow for consideration of and evidentiary development on the issue of data loggers and meters for use in the PR Verification Plan. The assigned Administrative Law Judge subsequently consolidated the three proceedings.

To promote a better technical understanding of the issues in this proceeding, the Commission's Energy Division facilitated a workshop on data loggers and interval meters on March 15, 2019. Subsequent supplemental testimony, amended testimony, rebuttal testimony and briefs were filed in 2019 and 2020.

Because the statutory deadline for this proceeding was extended multiple times, the Administrative Law Judge issued a ruling on July 27, 2022, setting aside submission of the record to take comment on two subsequent audits, enter the 2020 and 2021 audits into the evidentiary record, and allow parties to otherwise update the record. Parties filed comments on August 8, 2022 and reply comments on August 12, 2022. No party objected to receiving the 2020 and 2021 audits into the record. The record was resubmitted on August 12, 2022. After a Proposed Decision was issued, the Commission adopted the final Decision on December 1, 2022.

The Decision orders an incremental modification to the PR Verification Plan in order to improve the confidence level and margin of error of the annual verification audits to ensure compliance with the Commission's PR Policy. The Decision orders annual monitoring of the PR resources of a random set of Scenario 2 customers through the installation of a data logger and a current transformer, except for customers with fuel cells, who must submit interval meter data from on-board metering. Scenario 2 customers are DR customers who attest that they have a PR on their premises but will not use it to reduce load during a DR event. The annual monitoring is ordered to commence in 2024 to coincide with the verification audit for that year and is additional to the attestations and audits currently performed in the PR Verification Plan.

DISCUSSION

As noted, OP 3 of the Decision requires the IOUs to file this Advice Letter to describe the IOUs' recommended process for DR customers "selected to be audited and monitored to request monitoring of their prohibited resource through an on-board meter."¹

The Decision includes the following Findings of Fact (FOF):

- FOF 6: "It is only necessary to know whether a non-baseload producing resource is serving load to determine whether that resource is in violation of the Prohibited Resources Policy."²
- FOF 7: "Installation of a data logger in combination with a current transformer will indicate whether an end use is in operation."³
- FOF 27: "There is no record on the process for a customer requesting approval of monitoring its prohibited resource through an on-board meter."⁴

Some PR may already contain an integrated on-board meter, and the Decision allows for any customer to request the IOU to use data from such a meter in lieu of adding a separate data logger should that customer be randomly chosen to be audited.⁵

¹ D.22-12-004, OP 3, page 54.

² Id., FOF 6, p. 49.

³ Id., FOF 7, p. 49. In other words, the logger and transformer in combination will indicate if a PR is being utilized during a DR event.

⁴ Id., FOF 27, p. 51.

⁵ See id., Conclusion of Law (COL) 16, p. 53.

The IOUs have collaborated on devising a recommended process for determining the existence of on-board meters and a pathway for a customer who has a PR containing an on-board meter to request that the meter be used instead of a data logger. The IOUs have also recognized that there needs to be a process for the Verification Administrator to receive the data from an on-board meter, should a customer request to use one for their audit.

Therefore, the IOUs offer the following streamlined process, limited to addressing the scope of OP 3, to accommodate customers' requests to use on-board meters:

1. Once customers are randomly chosen for inclusion in an audit, the Verification Administrator (VA), whether an IOU or third party, will include in initial forms a request for the customer to:
 - a. Indicate whether they have an integrated on-board meter when they specify what type their PR is;
 - b. Indicate whether they prefer to not receive a data logger installed separately, but to use their own on-board meter in the required audit, and
 - c. Agree to terms providing that the option to use such a meter requires that the customer, as part of their audit, provide data from their meters, as requested by the VA.

The VA also will conduct two (2) required test events to show that any such on-board meter is able to provide the needed data and is working properly. Throughout the duration of the audit, the customer will be required to provide their data at three (3) distinct intervals: one data set will be to test the data quality before the DR season to ensure the data being provided is accurate, a second test data set mid-season to ensure the quality of the data, and one final set of data at the conclusion of the DR season which will be comprehensive of the entire audit period. The date of collection will be consistent with that of all other on-board meters and other VA scope of work that is yet to be determined. The terms will outline that a failure to meet the schedule and provide verified data in a timely manner prior to the start of the DR season may result in a data logger being installed for that customer to continue to participate in their chosen DR program.

The IOUs' goal is to minimize the number of times a customer must download their meter data and share it with the VA, to meet the requirements of the audit. The VA should receive the data after the DR season ends (i.e., late Fall), consistent with timing of the VA performing audits on customers using data loggers. Since customers are not able to opt out of the verification audit, the customer using an on-board meter must provide the data on time or be fitted with a separate data logger, should they not abide by the terms of using their own on-board meter. If they refuse to receive a data logger, then the VA will refer that customer to their respective IOU. The IOU will then communicate to the customer that they will no longer be able to participate in a DR program that prohibits the defined resources.

The IOUs respectfully request that the Commission accept the above-outlined recommended process for customers to request use of an on-board meter when one is available and functioning to fulfill the audit requirements.

EFFECTIVE DATE

Per OP 3 of the Decision, this submittal is classified as Tier 3 (effective after Commission approval) pursuant to GO 96-B.

PROTEST

Anyone may protest this Advice Letter to the California Public Utilities Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be submitted electronically and must be received by February 21, 2023, which is 22 days from the date filed. There is no restriction on who may file a protest.

The protest should be sent via e-mail to the attention of the Energy Division at EDTariffUnit@cpuc.ca.gov. A copy of the protest should also be sent via e-mail to the address shown below on the same date it is delivered to the Commission.

Attn: Greg Anderson
Regulatory Tariff Manager
E-mail: GAnderson@sdge.com
SDGETariffs@sdge.com

For SCE: Connor Flanigan
Managing Director, State Regulatory Operations
Southern California Edison Company
E-mail: AdviceTariffManager@sce.com

Tara S. Kaushik
Managing Director, Regulatory Relations
c/o Karyn Gansecki
Southern California Edison Company
E-mail: Karyn.Gansecki@sce.com

For PG&E: Sidney Dietz
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
E-mail: PGETariffs@pge.com

NOTICE

A copy of this filing has been served on the utilities and interested parties shown on the attached list and Service Lists A.18-10-008, A.18-10-009, and A.18-10-010, by either providing them a copy electronically or by mailing them a copy hereof, properly stamped and addressed.

Address changes should be directed to SDG&E Tariffs by e-mail at SDGETariffs@sdge.com.

/s/ Clay Faber

CLAY FABER
Director – Regulatory Affairs



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:
E-mail:
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

General Order No. 96-B
ADVICE LETTER SUBMITTAL MAILING LIST

cc: (w/enclosures)

Public Utilities Commission
CA. Public Advocates (CalPA)

R. Pocta
F. Oh
P. Cunningham

Energy Division

M. Ghadessi
M. Salinas
L. Tan
R. Ciupagea
K. Navis
Tariff Unit

CA Energy Commission

B. Penning
B. Helft

Advantage Energy

C. Farrell

Alcantar & Kahl LLP

M. Cade
K. Harteloo

AT&T

Regulatory

Barkovich & Yap, Inc.

B. Barkovich

Biofuels Energy, LLC

K. Frisbie

Braun & Blaising, P.C.

S. Blaising
D. Griffiths

Buchalter

K. Cameron
M. Alcantar

CA Dept. of General Services

H. Nanjo

California Energy Markets

General

California Farm Bureau Federation

K. Mills

California Wind Energy

N. Rader

Cameron-Daniel, P.C.

General

City of Poway

Poway City Hall

City of San Diego

L. Azar
J. Cha
D. Heard
F. Ortlieb
H. Werner
M. Rahman

Clean Energy Renewable Fuels, LLC

P. DeVille

Clean Power Research

T. Schmid
G. Novotny

Commercial Energy

J. Martin
regulatory@commercialenergy.net

Davis Wright Tremaine LLP

J. Pau

Douglass & Liddell

D. Douglass
D. Liddell

Ellison Schneider Harris & Donlan LLP

E. Janssen
C. Kappel

Energy Policy Initiatives Center (USD)

S. Anders

Energy Regulatory Solutions Consultants

L. Medina

Energy Strategies, Inc.

K. Campbell

EQ Research

General

Goodin, MacBride, Squeri, & Day LLP

B. Cragg
J. Squeri

Green Charge

K. Lucas

Hanna and Morton LLP

N. Pedersen

JBS Energy

J. Nahigian

Keyes & Fox, LLP

B. Elder

Manatt, Phelps & Phillips LLP

D. Huard

McKenna, Long & Aldridge LLP

J. Leslie

Morrison & Foerster LLP

P. Hanschen

MRW & Associates LLC

General

NLine Energy

M. Swindle

Stoel Rives LLP

S. Hilton
L. McKenna

NRG Energy

D. Fellman

Pacific Gas & Electric Co.

M. Lawson
M. Huffman
Tariff Unit

RTO Advisors

S. Mara

SCD Energy Solutions

P. Muller

SD Community Power

L. Fernandez
L. Utouh

Shute, Mihaly & Weinberger LLP

O. Armi

Solar Turbines

C. Frank

SPURR

M. Rochman

Southern California Edison Co.

K. Gansecki

TerraVerde Renewable Partners LLC

F. Lee

TURN

M. Hawiger

UCAN

D. Kelly

US Dept. of the Navy

K. Davoodi

US General Services Administration

D. Bogni

Valley Center Municipal Water Distr

G. Broomell

Western Manufactured Housing

Communities Association

S. Dey

Copies to

AddisScott9@aol.com
ckingaei@yahoo.com
clower@earthlink.net
hpayne3@gmail.com
puainc@yahoo.com
AKanzler@anaheim.net

Service List

A.18-10-008
A.18-10-009
A.18-10-010

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
Braun Blaising Smith Wynne, P.C.
California Cotton Ginners & Growers Assn
California Energy Commission

California Hub for Energy Efficiency
Financing

California Alternative Energy and
Advanced Transportation Financing
Authority
California Public Utilities Commission
Calpine

Cameron-Daniel, P.C.
Casner, Steve
Center for Biological Diversity

Chevron Pipeline and Power
City of Palo Alto

City of San Jose
Clean Power Research
Coast Economic Consulting
Commercial Energy
Crossborder Energy
Crown Road Energy, LLC
Davis Wright Tremaine LLP
Day Carter Murphy

Dept of General Services
Don Pickett & Associates, Inc.
Douglass & Liddell
Dish Wireless L.L.C.

East Bay Community Energy Ellison
Schneider & Harris LLP
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie
Green Power Institute
Hanna & Morton
ICF

iCommLaw
International Power Technology
Intertie

Intestate Gas Services, Inc.

Johnston, Kevin
Kelly Group
Ken Bohn Consulting
Keyes & Fox LLP
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated
Waste Management Task Force
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McClintock IP
McKenzie & Associates

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.

Resource Innovations

SCD Energy Solutions
San Diego Gas & Electric Company

SPURR
San Francisco Water Power and Sewer
Sempra Utilities

Sierra Telephone Company, Inc.
Southern California Edison Company
Southern California Gas Company
Spark Energy
Sun Light & Power
Sunshine Design
Stoel Rives LLP

Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

TransCanada
Utility Cost Management
Utility Power Solutions
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy