



October 26, 2020

Via U.S. Mail and E-Mail ([EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov))

California Public Utilities Commission

**Attention: Tariff Unit**

505 Van Ness Avenue

San Francisco, CA 94102

**RE: Supplemental Advice Letters (ALs) 5950-E-A (Pacific Gas and Electric), 4293-E-A (Southern California Edison), and 3608-E-A (San Diego Gas & Electric) (Demand Response Auction Mechanism Pilot for 2022)**

**PROTEST OF CALIFORNIA EFFICIENCY + DEMAND MANAGEMENT COUNCIL, CPOWER, ENEL X NORTH AMERICA, INC., LEAPFROG POWER, INC., AND OHMCONNECT, INC.**

Dear Energy Division Tariff Unit:

On October 18, 2020, Pacific Gas and Electric Company (“PG&E”), Southern California Edison Company (“SCE”), and San Diego Gas & Electric Company (“SDG&E”) (collectively, the “IOUs”) submitted joint Supplemental Advice Letter 5950-E-A (PG&E), 4293-E-A (SCE), and 3608-E-A (SDG&E) on revisions to the Demand Response Auction Mechanism (“DRAM”) Pilot for the 2021 auction for 2022 delivery (“Supplemental Advice Letter”). The California Efficiency + Demand Management Council (the “Council”), CPower, Enel X North America, Inc., Leapfrog Power, Inc., and OhmConnect, Inc. (collectively, “the Joint Parties”) appreciate the opportunity to protest this Supplemental Advice Letter filing.<sup>1</sup>

#### **Definition of DC Dispatch**

The IOUs propose to further revise their proposed definition of “DC Dispatch” because, as the IOUs characterize it, the Joint Parties point out that the IOUs’ use of the term “Clock Hour” is not appropriate for CAISO real-time market dispatches because they may not always begin at the top of the hour.<sup>2</sup> The revisions in the Supplemental Advice Letter to the DC Dispatch definition proposed in joint SDG&E AL 3608-E, et al specify that the proposed

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<sup>1</sup> The views expressed by the Council are not necessarily those of its individual members.

<sup>2</sup> Supplemental Advice Letter, at p. 3.

definition of Clock Hour continues to apply to day-ahead market (“DAM”) dispatches but not to real-time market (“RTM”) dispatches.<sup>3</sup>

The Joint Parties again recommend that the Commission reject the IOUs’ revised revision to the DC Dispatch definition because they neglect to provide any explanation for why this proposal is necessary or appropriate. In their October 5 Protest to joint SDG&E AL 3608-E, et al, the Joint Parties highlighted that the IOUs had not provided a formal proposal for this revision in the DRAM Working Group Report, nor had they even tried do so in the body of the advice letter other than to simply note that they had made the revision to Exhibit A of the DRAM Purchase Agreement.<sup>4</sup> Even in the Supplemental Advice Letter, they make no effort to explain why this revision to the DC Dispatch definition is necessary or justified.

More substantively, the IOUs’ revised DC Dispatch definition is also inappropriate because it removes the applicability of the Clock Hour definition to RTM dispatches but not to DAM dispatches, in response to the argument made by the Joint Parties in their protest that the RTM regularly clears on non-clock intervals.<sup>5</sup> The Joint Parties clearly intended for this to be an example of why the Clock Hour definition is problematic in general. Nowhere in the Joint Parties’ Protest was it specified that the Clock Hour definition should only apply to the DAM. The fact is, both the RTM and DAM regularly clear on non-Clock Hour intervals, so the IOUs’ reasoning for removing the applicability of Clock Hour to RTM dispatches clearly holds true for DAM dispatches. Consequently, the Clock Hour definition has no applicability, so it should be removed from the DRAM Purchase Agreement.

## CONCLUSION

The Joint Parties recommend that the Commission take the actions recommended above.

Respectfully submitted,

October 26, 2020

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<sup>3</sup> Supplemental Advice Letter, at p. 3.

<sup>4</sup> Protest of the California Efficiency + Demand Management Council, CPower, Enel X North America, Inc., Leapfrog Power, Inc., and OhmConnect, Inc., October 5, 2020, at p. 5.

<sup>5</sup> *Id.*

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cc: Courtesy Electronic Service to Service Lists in A.17-01-012, et al. (Demand Response Programs)