



June 1, 2021

Via E-Mail (EDTariffUnit@cpuc.ca.gov)

California Public Utilities Commission

Attention: Tariff Unit

505 Van Ness Avenue

San Francisco, CA 94102

RE: San Diego Gas & Electric Advice Letter (AL) 3746-E Request for Approval to Increase Customer Registrations

RESPONSE OF CALIFORNIA EFFICIENCY + DEMAND MANAGEMENT

COUNCIL

Dear Energy Division Tariff Unit:

On May 12, 2021, San Diego Gas & Electric (“SDG&E”) submitted a request for approval to increase its Electric Rule 32 customer registrations. The California Efficiency + Demand Management Council (the “Council”) appreciates the opportunity to respond to this advice letter filing.

Background

The Council is a statewide trade association of non-utility companies that provide energy efficiency, demand response and data analytics services and products in California.¹ Our member companies employ many thousands of Californians throughout the state, including demand response and grid services technology providers, implementation and evaluation experts, energy service companies, engineering and architecture firms, contracts, financing experts, workforce training entities, and manufacturers of energy efficiency products and equipment. The Council’s mission is to support appropriate demand response and energy efficiency policies, programs, and technologies to create sustainable jobs, long-term economic growth, stable and reasonably priced energy infrastructures, and environmental improvement.

The Council has been an active participant in the Demand Response (“DR”) Programs, Pilots and Budgets proceeding (A.17-01-012 et al), Direct Participation (A.14-06-001 et al), and DR Rulemaking (R.13-09-011).

¹ More information about the Council, including the organization’s current membership, Board of Directors, antitrust guidelines and code of ethics for its members, can be found at www.cedmc.org.

Response

I. SDG&E's request should be approved to keep up with growth in third-party DR participation.

In its advice letter, SDG&E seeks to notify the California Public Utilities Commission ("Commission") of its intention to increase the number of customer registrations in its DR direct participation program governed by Electric Rule 32 by an additional 200,000 customers. According to SDG&E, this would require the use of \$300,000 of budget already approved in Decision ("D.") 17-12-003 to add the necessary number of licenses through 2022.² The Commission should approve SDG&E's advice letter to avoid creating any bottlenecks in the available Rule 32 registrations. SDG&E's request is not frivolous, as it reflects the anticipated needs of the DR providers operating within its service territory.³ With tight supply conditions anticipated in summer 2021 and potentially 2022, it would be prudent to provide the business certainty that DR providers need to justify devoting the resources to recruit new customers into their DR resources.

Conclusion

The Council recommends that the advice letter be approved for the reasons provided above.

Respectfully submitted,

June 1, 2021

GREG WIKLER

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cc (E-Mail):

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² AL 3746-E, at p. 2.

³ *Id.*

cc (E-Mail):

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cc: Courtesy Electronic Service to Service Lists in R.13-09-011 (Demand Response), A.14-06-001 et al (Direct Participation), and A.17-01-012, et al. (Demand Response Programs)