



June 27, 2024

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

California Public Utilities Commission

Attention: Tariff Unit

505 Van Ness Avenue

San Francisco, CA 94102

**RE: Advice Letter (AL) 7193-E-A (Pacific Gas & Electric Company)
Supplemental: PG&E Advice Letter Detailing the Automated Response
Technology Program, in Compliance with Decision 23-12-005 and Decision
23-06-029
RESPONSE OF CALIFORNIA EFFICIENCY + DEMAND MANAGEMENT
COUNCIL AND UPLIGHT INC.**

Dear Energy Division Tariff Unit:

On June 7, 2024, Pacific Gas and Electric Company (“PG&E”) submitted a supplemental Advice Letter (“Supplemental AL”) in compliance with Ordering Paragraph (“OP”) 25 of California Public Utilities Commission (“Commission” or “CPUC”) Decision (“D.”) 23-12-005, requiring PG&E to submit a Tier 3 advice letter detailing the full program characteristics of the Automated Response Technology (“ART”) program. In the supplemental AL, PG&E includes redlined tariff revisions to the E-ART Tariff (“the tariff”). In addition, in compliance of OP 30 of D.23-06-029, PG&E includes, in this supplemental AL, additional availability requirements for Proxy Demand Response (“PDR”) resources. The supplemental AL also provides information incremental to PG&E’s original ART AL (AL 7193-E (PG&E)). The California Efficiency + Demand Management Council (the “Council”) and Uplight Inc. (“Uplight”) (collectively “the Joint Parties”) appreciate the opportunity to respond to this AL filing.

BACKGROUND

The Council is a statewide trade association of non-utility businesses 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. They include energy efficiency (“EE”), demand response (“DR”), and distributed energy resources (“DER”) service providers, implementation and evaluation experts, energy service companies, engineering and architecture firms, contractors, financing experts, workforce training entities, and energy efficient product manufacturers. The Council’s mission is to support appropriate EE, DR, and DER policies, programs, and technologies to create sustainable jobs, long-term economic growth, stable and reasonably priced energy infrastructures, and environmental improvement.

Uplight is a technology provider to over 80 electric and gas utilities across North America, providing customer engagement and demand management solutions to help utilities achieve their energy and carbon reduction goals. Uplight serves as the operating system of the grid edge by orchestrating DER assets (including smart devices, electric vehicles, batteries, and more) to maintain a reliable, affordable, decarbonized grid. Our software enables utilities and their residential and business customers to deploy a range of solutions, including demand.

THE JOINT PARTIES’ RESPONSE

I. PG&E’s Supplemental AL makes no changes to the program design and should be approved.

As PG&E describes, the Supplemental AL provides an updated E-ART tariff to reflect 1) new availability requirements for Proxy Demand Resources (“PDR”) that had been adopted by the Commission in Ordering Paragraph 30 of Decision (“D.”) 23-06-029 in order for the ART resources to qualify for Resource Adequacy (“RA”) , and 2) recent Energy Division requests for clarification on several operational elements of the ART program.

The first category of changes is, for all intents and purposes, ministerial because it is in compliance with a very clear set of Commission-approved rules, i.e., updated RA availability requirements, and does not attempt to change the ART program design. The second category simply expands on the operational details of how PG&E intends to deploy the program. In the Joint Parties’ view, these particular details are also distinct from program design elements and therefore do not warrant a high level of scrutiny.

¹ Additional 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 <http://www.cedmc.org>. The views expressed by the Council are not necessarily those of its individual members.

In light of the ministerial nature of the first category of revisions and the operational nature of the second category of revisions, the additional content in the Supplemental AL should not inhibit the Commission's approval.

II. The Commission should approve the Supplemental AL as quickly as possible to avoid depleting the Bring Your Own Thermostat program bridge funding.

The Joint Parties support the Council's statement in the Council's March 19 Response to AL 7193-E which supports prompt approval of the Supplemental AL because it retains the approximately 100,000 customers currently enrolled in PG&E's Bring Your Own Thermostat ("BYOT") program. With the bridge funding that had been approved in D.23-12-005 likely close to being fully depleted (if it has not been already), if the Commission does not approve the Supplemental AL very soon, these participants will be forcibly unenrolled with no guarantee that they will be willing to re-enroll whenever the ART program is ultimately approved.

CONCLUSION

The Council recommends that the Supplemental AL be expeditiously approved for the reasons provided above.

Respectfully submitted,

June 27, 2024

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cc: Electronic Service to Service List in A.22-05-002, et al. (Demand Response Programs)