BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Application of Pacific Gas and Electric Company (U 39 E) for Approval of its Demand Response Programs, Pilots and Budgets for Program Years 2023-2027	Application 22-05-002 (Filed May 2, 2022)
And Related Matters.	Application 22-05-003 Application 22-05-004

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March 21, 2025

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Application of Pacific Gas and Electric Company (U 39 E) for Approval of its Demand Response Programs, Pilots and Budgets for Program Years 2023-2027	Application 22-05-002 (Filed May 2, 2022)
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The California Efficiency + Demand Management Council, ("the Council") hereby submits this Response to the Petition for Modification of Decision ("D.") 22-12-009 ("Petition") submitted by Clean Energy Alliance, San Diego Community Power, and Mission:Data Coalition, Inc (jointly, "the Joint Petitioners") submitted in this proceeding on February 19, 2025. This Response is timely filed and served pursuant to Rule 16.4(f) of the Commission's Rules of Practice and Procedure.

I. 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] The Council's member companies employ many thousands of Californians throughout the state. They include energy efficiency ("EE"), demand response ("DR"), and distributed energy resource ("DER") service providers, implementation and evaluation experts, energy service companies,

[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.

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.

II. SUMMARY AND RECOMMENDED ACTION

On December 6, 2022, the Commission issued Decision ("D.") 22-12-009 which is the Decision Approving Investor-Owned Utilities' Demand Response Programs, Pilots, and Budgets for Bridge Year 2023 in Application ("A.") 22-05-002, et al. (DR Programs). On February 19, 2025, the Joint Petitioners submitted this Petition for Modification of D.22-12-009.

III. THE COUNCIL's RESPONSE

A. Approval of the Petition is essential to achieving state load management policies.

The Joint Petitioners have documented in great detail the regulatory record leading to the Commission's direction that San Diego Gas & Electric Company ("SDG&E") must provide access to real-time customer meter data to those who want it.[2] The Joint Petitioners have also clearly demonstrated that the Commission's approval in D.22-12-009 for SDG&E to discontinue providing these meter data via ZigBee connection was based on the presumption that the Commission would approve SDG&E's Smart Meter 2.0 rollout while leaving no gap.[3] However, as a matter of policy, it is clear that the Commission's intention could not be to leave all of SDG&E's customers without access to real-time meter data for an indeterminate number of years at the same time that the Commission and the California Energy Commission ("CEC") are

[2] Petition, at pp. 11-21.
[3] *Id.*, at pp. 21-28.

committed to the CalFUSE framework, and the broader implementation of the CEC's Load Management Standards ("LMS") and 7 GW Load Shift Goal ("LSG").

The Council agrees with the Petitioners that, in approving SDG&E's request in D.22-12-009 to discontinue servicing ZigBee-enabled customer meters in its service area, the Commission did so based on the presumption that there would be no gap in its capabilities to provide these data to customers. The Council believes this to be the case because in D.22-12-009, the Commission never directly addressed why it would change course after over ten years of decisions that supported customer access to real-time data that were cited by the Petitioners. Furthermore, maintaining this capability gap for what will likely be several years while SDG&E develops and litigates its Smart Meter 2.0 application, as directed by D.24-12-017, in addition to the implementation period, will significantly hamstring Commission and CEC policies within SDG&E's service area. The data capabilities provided through the ZigBee connections are needed in order to implement dynamic rates under the Commission's CalFUSE framework, and the CEC's LMS requirements (which also include dynamic rates) and 7 GW LSG.

On a broader level, the Council would assert that a low cost, universally accessible solution to provide customers with access to real-time usage data collected by AMI is an important option for DER providers to have access to in general. Real-time usage data enables greater load flexibility and helps instantly verify the performance of parts of providers' portfolios, improving curtailment outcomes. The discontinuation of real-time meter data by SDG&E was a step backward on this front, and approving this Petition is necessary to rectify this issue.

IV. CONCLUSION

The Council respectfully urges the Commission to approve the Petition for the reasons provided above.

Dated: March 21, 2025

Respectfully submitted,

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