

**DOCKETED**

<b>Docket Number:</b>	23-LMS-01
<b>Project Title:</b>	Load Management Standards Implementation
<b>TN #:</b>	252501
<b>Document Title:</b>	Slides from Statewide Tool Preliminary Meeting
<b>Description:</b>	Uploaded by CEC staff on behalf of PG&E. CEC staff did not attend the meeting.
<b>Filer:</b>	Stefanie Wayland
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
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# CEC LMS Statewide Tool

Preliminary Ad Hoc Meeting

September 20, 2023



Together, Building  
a Better California



# Agenda

## Topics to cover for 9/20/2023 09:00-10:00

- Organizational Items
- Review of Timeline
- Review of Reporting Requirements from CEC
- Review of Statewide Tool stated requirements
- Open Discussion on Statewide Tool
  - aspects / requirements & stakeholder points of interest
  - constraints / boundaries on utility implementers



# Organizational Items

- Notetaker, Chat msg alert, raised hands volunteer
- Context:
  - CEC LMS order to IOU/POU/CCA about the statewide tool
  - CEC reporting requirements
  - Ambiguity and need for clarity
- Goal: Define a time/space for group to discuss methods/means/topics
- Preliminary Ad Hoc Meeting

Participant Name	Organization
Lin, John	PG&E
Howie, Mihaela	PG&E
Chiu, Albert	PG&E
Mariko Marianes	LADWP
Mikia Enguillado	SMUD
Nate Kinsey – UtilityAPI	UtilityAPI
Bob Cruickshank	NREL
Martinez, Vanessa	CPUC
DeTuri, Jeff N	SDG&E
Kahryn Riley	Ecobee/Generac.com
Michael Obyrne	SMUD
Woo, shirley	PG&E
Iliev, Alexander	PG&E
Haro, Chelsea	SDG&E
Quffa, Costi	PG&E
Brandon Sanders	SCE
Bruce Nordman	LBNL
Frank (Guest)	OpenADR
Anand Prakash	LBNL
Schenck, Lauren	CPUC
Eugene G	Bellawatt
Michael Quiroz	EBCE
Karen Herter	Consultant
Brawley, Thomas	CPUC
Jordi Burbano	LADWP



# Review of Timeline

## Outline of timeline and open questions

- (2) The Large IOUs, Large POU's and Large CCAs shall **submit** the single statewide standard tool **developed** pursuant to Section 1623(c)(1) to the Commission **for approval** at a Business Meeting.
  - (A) The tool must be submitted within eighteen (18) months of April 1, 2023.
  - (B) The Executive Director may extend this deadline upon a showing of good cause.
  - (C) The Large IOUs, Large POU's and Large CCAs shall describe a single set of **terms** and **conditions** they intend to require of third parties using the single statewide standard tool.
- (3) **Upon** Commission **approval** the Large IOUs, Large POU's and Large CCAs **shall implement and maintain** the tool **developed** in Section 1623(c)(1).

**October 1, 2024**



Developed

Implement

Maintain



# Reporting Requirements

## DOCKET NO. 23-LMS-01

- CEC staff:
  - 1. Request the regulated parties post plans, schedules, and monthly status reports on the progress of the single statewide rate access tool design and development to the LMS implementation docket 23-LMS-01 (<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=23-LMS-01>) until such time as the tool is fully implemented and publicly available. A single status report submission from multiple regulated parties is allowed.
  - 2. Will schedule public meetings to solicit public input and provide opportunities for regulated parties to inform the CEC and the public of tool design and development progress. These meetings will be publicly noticed as required by law

**October 1, 2024**



Developed

Implement

Maintain



# Statewide Tool 20 CCR § 1623(c)

- (c) Support Customer Ability to Link Devices to Electricity Rates.
  - (1) Third-party Access. The Large IOUs, Large POU's and Large CCAs shall develop a single statewide standard tool for authorized rate data access by third parties that is compatible with each of those entities' systems. The tool shall:
    - (A) Provide the RIN(s) applicable to the customer's premise(s) to third parties authorized and selected by the customer;
    - (B) Provide any RINs, to which the customer is eligible to be switched, to third parties authorized and selected by the customer;
    - (C) Provide estimated average or annual bill amount(s) based on the customer's current rate and any other eligible rate(s) if the Large IOU, Large POU or Large CCA has an existing rate calculation tool and the customer is eligible for multiple rates;
    - (D) Enable the authorized third party to, upon the direction and consent of the customer, modify the customer's applicable rate to be reflected in the next billing cycle according to the Large IOU's, Large POU's or Large CCA's standard procedures;
    - (E) Incorporate reasonable and applicable cybersecurity measures;
    - (F) Minimize enrollment barriers; and
    - (G) Be accessible in a digital, machine-readable format according to best practices and standards.
  - (2) The Large IOUs, Large POU's and Large CCAs shall submit the single statewide standard tool developed pursuant to Section 1623(c)(1) to the Commission for approval at a Business Meeting.
    - (A) The tool must be submitted within eighteen (18) months of April 1, 2023.
    - (B) The Executive Director may extend this deadline upon a showing of good cause.
    - (C) The Large IOUs, Large POU's and Large CCAs shall describe a single set of terms and conditions they intend to require of third parties using the single statewide standard tool.
  - (3) Upon Commission approval the Large IOUs, Large POU's and Large CCAs shall implement and maintain the tool developed in Section 1623(c)(1).



# Identification of domains of concerns

## Aspects of Statewide Tool

Customer  
Specific Data  
&  
Privacy/Cyber  
concerns

Statewide  
common  
functionality -  
Explicit

Rate Change  
Required  
Implicit

Rate  
Comparison  
Required  
Implicit

Other Implicit  
Requirements



# Constraints

## Current

- IOU/POU/CCA represent their individual organizations
- Funding mechanism is unclear
- Resourcing is constrained
- Process for coordination is indeterminate
  - How to obtain consensus
  - If consensus is not / cannot be arrived?



# Summary

## Based on discussion notes

- “Develop”- is it a plan, or an actual implementation, given that implementation is to happen upon approval by CEC?
  - CEC Staff explained previously that requirements are to be submitted on Oct. 1, 2024 and not the actual tool.
  - One likely product to be submitted is something to be packaged like an RFP for a 3rd party to bid on.
  - Wording has some ambiguity.
  - It is not reasonable to spend time and effort and money on actual product when it is not approved
- “Single statewide tool” – is it monolithic, or federated?
  - Customer specific data has privacy and cyber concerns - individual implementation would provide a more secure system.
  - Federated system connected to single tool is one model
  - Statewide clearinghouse of federated implementations
  - IOUs have similar functionalities to leverage
  - Developing a plan/specification is very important prior to Oct. 1, 2024
- Who or what is authoritative voice / body? What is its scope?
  - Unclear who will/how to set the design parameters
  - Eventually the executive board of the commission has the approval authority to approve/reject.
  - Each participating organization has no authority over the other
  - Best if we have CEC lead the process; getting consensus of 10+ organization is a huge effort
- Note: SmartMeter Texas model – securely connects individuals to their account; to achieve SCALE, important for vendors to link to RATES that organizations have—residential addresses, etc.
  - Worry is that there might be barriers in 3rd party enrollment processes that could crush enrollment.



# Summary (continued)

## Based on discussions

- How will it work in federated system if customer has multiple providers – Supplier to Delivery. Bundled vs. Unbundled customer journey?
- IOU/POU/CCA represent their individual organizations
- Funding mechanism is unclear for individual organizations in absence of such mechanism in the ruling
- Resourcing is constrained at each and every organization
- Process for coordination is indeterminate where no party has jurisdiction and authority over the other
  - Recommend disinterested party to manage and lead or CEC to do so
  - If consensus cannot be reached, what will happen?

Reporting Requirement:

“Single status report submission is allowed”. Interpreting it as the group can submit one report together or separate reports from each entity are allowed.