



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

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Application of Pacific Gas and Electric Company for Approval of Its Proposals and Cost Recovery for Improvements to the Click-Through Authorization Process Pursuant to Ordering Paragraph 29 of Resolution E-4868. (U39E)	A.18-11-015 (filed November 26, 2018)
And Related Matters.	A.18-11-016 A.18-11-017

**JOINT RESPONSE OF HOME ENERGY ANALYTICS, MISSION:DATA COALITION
AND OHMCONNECT, INC.
TO SOUTHERN CALIFORNIA EDISON COMPANY'S NOVEMBER 13, 2020 MOTION**

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November 30, 2020

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1. Introduction

Pursuant to Rule 11.1(e) of the California Public Utilities Commission’s Rules of Practice and Procedure, Home Energy Analytics (“HEA”), Mission:data Coalition (“Mission:data”) and OhmConnect, Inc. (“OhmConnect”; together, the “Joint Parties”) respectfully submit this Joint Response¹ to the November 13, 2020 Motion of Southern California Edison Company (“SCE”) for an Order Approving the Interim Click-Through and Rule 24 Memorandum Account with an Immediate Effective Date (the “SCE Motion”).

¹ Pursuant to the Commission’s Rules of Practice and Procedure 1.8(d), Mission:data confirms that HEA and OhmConnect have authorized Mission:data to file this Joint Response on behalf of their organizations.

2. Discussion

After considering the SCE Motion, the Joint Parties support SCE's motion for an Administrative Law Judge ("ALJ") ruling establishing a memorandum account as of November 13, 2020. Specifically, the Joint Parties understand that the software and information technology ("IT") infrastructure underlying SCE's current click-through solution has not, and will not, remain conveniently frozen in amber while the present docket, A.18-11-015 (consolidated), is being adjudicated. In order to comply with past Commission directives regarding the click-through system for demand response providers ("DRPs"), as well as to be positioned to adhere to a Commission order in the present docket, near-term changes to SCE's IT infrastructure may very well be necessary. Since the Joint Parties have experience building and maintaining IT infrastructure ourselves, we can understand the need to add flexibility to "back-end" infrastructure in order to support both past and future requirements. Failure to make such improvements while waiting for a decision in this proceeding simply to avoid concerns of retroactive ratemaking could result in larger costs to ratepayers over the long run. Furthermore, the memorandum account will not prevent parties or the Commission from subsequent prudence reviews of SCE's investments. The Joint Parties are persuaded that creating the memorandum account helps avoid retroactive ratemaking concerns, will give SCE the flexibility needed to deliver on its obligations in a cost-effective manner, and will not limit parties' options to interrogate the reasonableness of costs.

3. Conclusion

For the reasons stated above, the Joint Parties support the SCE Motion.

Dated: November 30, 2020

Respectfully submitted,

FOR MISSION:DATA COALITION

/s/

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FOR HOME ENERGY ANALYTICS

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