

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



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IN ATTENDANCE: PRESIDENT MARYBEL BATJER
 COMMISSIONER MARTHA GUZMAN ACEVES
 COMMISSIONER DARCIE HOUCK
 COMMISSIONER CLIFFORD RECHTSCHAFFEN
 COMMISSIONER GENEVIEVE SHIROMA

ADMINISTRATIVE LAW JUDGE BRIAN STEVENS, presiding

)	ORAL ARGUMENT
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)	
Order Instituting Rulemaking to)	
Establish Policies, Processes, and)	
Rules to Ensure Reliable Electric)	Rulemaking
Service in California in the Event)	20-11-003
of an Extreme Weather Event in 2021.)	
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REPORTERS' TRANSCRIPT
Virtual Proceeding
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Reported by: Carol Ann Mendez, CSR No. 4330
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VIRTUAL PROCEEDING

MARCH 19, 2021 - 9:03 A.M.

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ADMINISTRATIVE LAW JUDGE STEVENS: We will be on the record. Good morning. This is the final Oral Argument we conduct in Rulemaking 20-11-003. This is the Oral Argument to be held before a quorum of the Commissioners.

First of all, I want to sincerely thank all of the parties who participated in this proceeding -- this highly expedited proceeding and for being here this morning.

I will note the court reporters will be transcribing the event today; so, please, speak slowly, which is difficult for our hearings here.

A couple of additional notes: Please, do not talk over one another when we get into the open dialogue period. The second is that Commissioners may ask questions at any time. The third is that I will be timing the speaking session, and, unfortunately, we'll need to cut speakers off.

Additionally, Carol had reached out this morning and asked that if parties are reading from scripts, to please send them

1 along. I will ask James Donovan to paste the
2 e-mail addresses in the chat. You can send
3 those through to make sure we get an accurate
4 reading of your script if you're reading from
5 one. So I will quickly dive into the order
6 of events, and then we'll ask for opening
7 comments from Commissioners, and then we'll
8 dive into the substance.

9 First, we'll speak to Flex Alert and
10 Critical Peak Pricing issues, the second is
11 the Emergency Load Reduction Program and
12 Demand Response issue, the third is capacity
13 and supply-side issues, and then the fourth
14 thing we'll do is, we'll turn to open
15 question time from the Commissioners to seek
16 additional information from the parties.

17 So before we dive into the
18 presentations of the parties, I'm going to
19 run through the Commissioners and ask for
20 opening remarks. We will start this morning
21 with President Batjer.

22 President Batjer, do you have any
23 opening remarks?

24 PRESIDENT BATJER: Very brief, Judge.

25 First of all, I want to thank you.
26 You're right. This has been an exceedingly
27 sped-up OIR. I appreciate all of the
28 parties, and everyone from the Commission

1 staff who has worked so diligently and so
2 hard. We have the pressures of mother nature
3 and of time, and those are not in our
4 control. So I appreciate greatly that
5 everyone has worked very hard.

6 I'm going to be listening very
7 carefully today. All of the parties'
8 comments are important to me, and I agree
9 with the Judge; let's be respectful of each
10 other's time and respectful of each other's
11 positions, and I will only be in listening
12 mode today. I will not be on video, so I
13 apologize in advance. Thank you all very
14 much for your participation.

15 ALJ STEVENS: Thank you. We'll turn it
16 over to the new Commissioner, Commissioner
17 Houck; do you have any comments?

18 COMMISSIONER HOUCK: Just very, very
19 briefly. I know the schedule is tight this
20 morning, but I know this proceeding has moved
21 rapidly and has required a heavy lift from
22 everyone involved. I want to express my
23 thanks to all of the parties that are
24 participating in today's Oral Argument, and
25 thanks, particularly, to ALJ Stevens for all
26 of your hard work, and President Batjer for
27 her leadership on this matter.

28 So I also will be listening very

1 closely to all of the parties and look
2 forward to hearing everyone's positions on
3 the issues before us today, so thank you.

4 ALJ STEVENS: Great. Thank you.

5 Commissioner Guzman Aceves, do you
6 have any opening remarks?

7 COMMISSIONER GUZMAN ACEVES: Yes.
8 Thank you, Judge Stevens.

9 Good morning, everyone. I just
10 wanted to maybe highlight a couple of areas
11 that are of concern to me or interest so that
12 you could potentially address them in your
13 comments in your limited time.

14 One is, as someone who has been
15 focused on Demand Response for a long time in
16 looking at the evolution of this program, I
17 have some concern with the allowance of
18 diesel backup generators being allowed in the
19 ELRP program. So I'd like address that: Why
20 are we paying people if they're just going to
21 use diesel?

22 And, secondly, in the BIP proposal,
23 I also have some questions about if the
24 approach there is maybe the most efficient in
25 terms of the increase in payment there or if
26 there are other strategies for increasing
27 participation versus increase the incentives.

28 And, finally, if there are any

1 thoughts of the efficacy of the Flex Alert
2 budget and -- and open to perspectives on
3 those.

4 I'm sorry to be so quick, but those
5 are the areas that I am looking to hear more
6 from all of you, in addition to all of your
7 areas of concern and representation.

8 Thank you.

9 ALJ STEVENS: Thank you.

10 Commissioner Shiroma.

11 COMMISSIONER SHIROMA: Yes. Thank you,
12 Judge Stevens, to you and to President Batjer
13 for today's Oral Argument.

14 I appreciate the complexities of
15 planning for a reliable grid overlaid with
16 the realities that climate has brought us to
17 where we are today. I also appreciate all of
18 the different perspectives. I look forward
19 to hearing them, and my staff and I will be
20 listening keenly. Thank you.

21 ALJ STEVENS: Thank you.

22 And, finally, Commissioner
23 Rechtschaffen.

24 COMMISSIONER RECHTSCHAFFEN: I don't
25 have any opening comments. I will be
26 listening. I may be on and off video, but
27 I'll be listening the entire time.

28 ALJ STEVENS: Fantastic. Thank you for

1 that.

2 So at this time we will dive into
3 the party presentations. We're going to
4 start with the Flex Alert and Critical Peak
5 Pricing subject within the scope of this
6 rulemaking. We will start with the
7 California Association of Small
8 Multi-Jurisdictional Utilities, and I believe
9 we have Jed Gibson.

10 Jed, are you ready to go?

11 MR. GIBSON: Yes. Thank you, your
12 Honor.

13 ALJ STEVENS: Time starts now.

14 ARGUMENT OF MR. GIBSON

15 Thank you. Good morning,
16 Commissioners and Panelists. Jed Gibson on
17 behalf of the California Association of Small
18 and Multi-Jurisdictional Utilities or CASMU,
19 which consists of Bear Valley Electric
20 Service, Liberty Utilities, and PacifiCorp.

21 With respect to Flex Alert and
22 Critical Peak Pricing issues, it's important
23 to note that Flex Alerts are issued by the
24 California Independent System Operator or
25 ISO. Liberty and PacifiCorp do not operate
26 within the ISO. And Bear Valley is only
27 connected to the ISO via Southern California
28 Edison system.

1 Further, and, perhaps more
2 importantly, as outlined in earlier comments,
3 based on the undisputed testimony provided by
4 the CASMU members, given that the CASMU
5 members did not face the same reliability
6 challenge as other Load Serving Entities
7 during 2020 extreme weather events and are
8 not expected to face similar challenges in
9 2021, even in the event of extreme weather
10 events, there is no demonstrable need for a
11 paid media Flex Alert campaign in the CASMU
12 member service territory.

13 Additionally, the CASMU members'
14 information technology systems do not have
15 the ability to operate the Critical Peak
16 Pricing system or program. Accordingly, the
17 CASMU members should be exempted from any
18 Flex Alert or Critical Peak Pricing
19 requirement that are ultimately adopted in
20 this proceeding. Thank you.

21 ALJ STEVENS: Let's move on to Jane
22 Krikorian with Utility Consumers' Action
23 Network. Ms. Krikorian, are you on the line?

24 MS. KRIKORIAN: Yes, I am.

25 ALJ STEVENS: Your time starts now.
26 You have three minutes.

27 ARGUMENT OF MS. KRIKORIAN

28 Thank you, your Honor.

1 At the outset of this proceeding,
2 UCAN explained that PG&E, SCE, and SDG&E have
3 not been providing non-IOU Load Serving
4 Entities with timely access to SmartMeter
5 data, and that this was the root cause of the
6 rolling blackouts in August 2020. The
7 subsequent Final Root Cause Analysis came to
8 the same conclusion and recommended that the
9 Commission take action before summer 2021 to
10 address this SmartMeter data access problem.

11 Californians have paid billions of
12 dollars to modernize our grid with
13 SmartMeters that record how much electricity
14 is being used on an hourly or 15-minute
15 basis.

16 This granular data is extremely
17 valuable in terms of enhancing the accuracy
18 of short-term load forecasts and ensuring
19 stable operations, particularly during
20 extreme weather events. Withholding this
21 data from LSEs decreases the accuracy of
22 their CAISO day-ahead market forecasts and
23 prevents them from scaling-up Critical Peak
24 Pricing and other dynamic rate programs -
25 increasing costs for all ratepayers.

26 UCAN'S filings have proven that the
27 utilities collect and validate SmartMeter
28 data every day and have the data in-hand by

1 8:00 a.m., which is two hours before the
2 CAISO day-ahead market deadline for load
3 forecasts. The utilities provide this data
4 to their own third-party contractors to
5 support utility operations every day;
6 however, they do not provide the LSEs the
7 same data access.

8 UCAN's recommendation to provide
9 SmartMeter data on an equal, day-after basis
10 to all LSEs has been cited three times by
11 CalCCA and cited by other parties such as
12 SBUA, TURN, Sierra Club and the Union of
13 Concerned Scientists, 350 Bay Area, and
14 CEERT; however, none of this is mentioned in
15 the Proposed Decision.

16 While the Proposed Decision directs
17 the utilities to host a workshop on April 7th
18 with access to SmartMeter data listed as a
19 topic for decision, this is only as a barrier
20 to Critical Peak Pricing programs, not daily
21 load forecasts.

22 To avoid the possibility of rolling
23 blackouts this summer by ensuring more
24 accurate load forecasts, the Commission
25 should take action now in the Final Decision
26 and direct the IOUs to work with LSEs in
27 their service territories to ensure high
28 quality interval data is available in a

1 timely manner.

2 Thank you.

3 ALJ STEVENS: Thank you, Ms. Krikorian.
4 Great timing.

5 Let's move on to Mr. Pinjuv from the
6 CAISO. Are you on the line?

7 MR. PINJUV: Yes. Thank you, Judge
8 Stevens.

9 ALJ STEVENS: Time starts now. Go
10 ahead.

11 ARGUMENT OF MR. PINJUV

12 Thank you, Judge Stevens, and the
13 Commissioners for this opportunity to comment
14 on the Proposed Decision today.

15 First, I want to express my overall
16 appreciation for the Commission's efforts to
17 expedite this proceeding and to get the new
18 resources in place for summer 2021. It truly
19 was a significant effort, and on behalf of
20 the ISO, we appreciate those efforts.

21 Turning to specifically the Flex
22 Alert program, the ISO supports the proposed
23 decision funding for the Flex Alert program
24 and its direction to implement by summer
25 2021.

26 The Flex Alert program, we believe,
27 is vitally important to maintain a direct
28 line of communication with our customers, and

1 we hope that new funding the proposed
2 decision provides for will allow us to
3 modernize the program and expand the reach to
4 new users outside of the traditional
5 advertising channels. The ISO looks forward
6 to working with Southern California Edison
7 and vendors to implement the program to the
8 greatest effect possible for summer of 2021.

9 That concludes my comments.

10 ALJ STEVENS: Okay. Thank you.

11 Next up is Southern California
12 Edison with two minutes. Is Ms. Sloan on the
13 line?

14 MS. SLOAN: Yes, and I am here. Can
15 you hear me?

16 ALJ STEVENS: Yes, I can. Your time
17 starts now. Thank you.

18 ARGUMENT OF MS. SLOAN

19 Thank you, Judge Stevens, and
20 Commissioners, for the opportunity to speak
21 this morning.

22 Southern California Edison shares
23 your and other parties' commitment taking
24 actions to ensure system reliability in
25 support of our customers. We are focusing
26 our comments today on making sure that the
27 tools provided in this decision to meet
28 system reliability, which is our shared goal,

1 will be implementable for this summer.

2 We understand there is a desire to
3 expand the current Critical Peak Pricing
4 program, and we can support some of the
5 changes in the Proposed Decision; however,
6 the requirement for SCE to add weekends and
7 holidays as potential Critical Peak Pricing
8 call days will be extremely costly to
9 customers and cannot be accommodated for this
10 summer without up to \$14 million of
11 additional costs for manual work as CPP is
12 currently operated.

13 SCE requests that the Commission
14 defer implementation to this change to summer
15 of 2022, similar to what was allowed for
16 PG&E's and SDG&E's Critical Peak Pricing
17 changes.

18 CPP credits and charges are billed
19 according to peak periods, which are
20 different on holidays and weekends. Today
21 these credits and charges don't exist in our
22 billing system on weekends or holidays
23 because they've never been applicable. We
24 would have to create new billing factors in
25 the system for every affected rate -
26 currently eight of them - which can't be done
27 in time for this summer.

28 Similar to San Diego Gas & Electric,

1 SCE is making billing system changes as we
2 speak and will go live with these changes for
3 our customers, 4.5 million of them, in a
4 matter of days.

5 We must hold any changes to the
6 billing system until the end of system
7 stabilization, which goes through the end of
8 this year.

9 Considered CPP is a small part of
10 SCE's Demand Response portfolio - only 8
11 megawatts out of a total of 900 - SCE
12 requests a deferment of this change to next
13 summer.

14 SCE would also need authority to
15 recover the cost of this change, if it is
16 required, and recommends the Commission
17 authorize a two-way balancing account.

18 Thank you.

19 ALJ STEVENS: Thank you.

20 Let's move on to Pacific Gas &
21 Electric, Fabienne Arnoud. I understand that
22 you don't have video access. Are you on the
23 line?

24 MS. ARNOUD: Can you hear me?

25 ALJ STEVENS: Yes, we can.

26 ARGUMENT OF MS. ARNOUD

27 Good morning, President Batjer,
28 Commissioners, and Judge Stevens. Thank you

1 for the opportunity to address you today.

2 Regarding Critical Peak Pricing for
3 SmartRates and Peak Day Pricing programs,
4 PG&E is able to implement the 4:00 to 9:00
5 p.m. even hours by summer 2022 as requested
6 in the Proposed Decision. To cover the cost
7 for implementation, customer outreach, and
8 education, PG&E is requesting authorization
9 for price recovery of \$2,635,000 and this
10 includes the \$500,000 authorized currently in
11 the Proposed Decision for improving customer
12 performance, an additional \$135,000 to
13 educate Peak Day Pricing customers about the
14 new hours, and \$2 million for implementation
15 and IT costs for changing the event hours.

16 Due to the change, PG&E will file a
17 Tier 2 Advice Letter with revised charges and
18 credits to maintain revenue neutrality, and
19 we will file sufficiently in advance for
20 those revised surcharges and credits to go
21 into effect for summer 2022.

22 ALJ STEVENS: Next up is Sierra Club.
23 We have Nina Robertson. Nina, are you on the
24 line?

25 ARGUMENT OF MS. ROBERTSON

26 Yes, I am. Good morning. Thank
27 you. Sierra Club has a fundamental concern
28 that Flex Rates would not reduce load during

1 peak hour as the Commission appears to
2 assume. CEJA entered into the record a study
3 of Flex Alerts in California by Christensen
4 and Associates, which finds that electricity
5 consumption may actually increase by as much
6 as 600 megawatts in response to Flex Alerts.

7 The study also concluded that its
8 findings were consistent with two other
9 similar evaluations with Flex Alerts in this
10 state. They find these findings of
11 ineffectiveness highly troubling. It begs
12 the question of why the Commission would
13 choose to rely on this unproven tool to keep
14 the lights on.

15 Moreover, the Commission has not
16 even so much as acknowledged the Christensen
17 study nor has it provided any contrary
18 evidence that Flex Alerts actually work. We
19 are, therefore, very concerned that the
20 Commission is reverting to unproven methods
21 that put the grid at risk.

22 There are other options that do have
23 a proven track record of reducing peak demand
24 and they include programs that compensate
25 residential consumers. They have put forward
26 such a program that focuses on low-income
27 households; yet the Commission has not even
28 acknowledged that they have a proposal.

1 Our members expect more. They
2 expect the Commission to base its decisions
3 on actual evidence so that we are sure that
4 we are using the tools that work to prevent
5 blackouts. They expect special attention to
6 low-income households that are already
7 struggling to pay their electricity bills,
8 and they expect the Commission to take
9 seriously the innovative proposals that
10 parties spent time and effort crafting and
11 that don't rely on including fossil fuels.

12 For this reason, we urge the
13 Commission to reconsider its reliance on Flex
14 Alerts and instead redirect resources towards
15 programs like CEJA's proposed pilot that will
16 actually reduce peak load while at the same
17 time benefiting families that need support as
18 electricity rates continue to increase.

19 Thank you.

20 ALJ STEVENS: Thank you.

21 Next up is the Union of Concerned
22 Scientists in combination with the California
23 Environmental Justice Alliance, we have Shana
24 Lazerow. Shana, are you on the line?

25 MS. LAZEROW: I am, yes. Good morning.

26 Thank you.

27 ALJ STEVENS: Great. The time starts
28 now.

ARGUMENT OF MS. LAZEROW

My name is Shana Lazerow on behalf of the California Environmental Justice Alliance. We are an alliance of environmental justice organizations. We organize in California's disadvantaged communities where community members are extremely concerned about the reliability of the grid and suffer the impacts both of outages and of the existing energy systems.

We feel, as Ms. Robertson expressed, that directing additional funding toward the Flex Alert program would be a mistake.

We are operating in an evidence-based system, and the only evidence that Flex Alerts are in any way effective suggest at best they're only marginally effective and at worst they result in an increase in consumption.

So rather than spending an additional \$12 million of ratepayer funds on this program, the HUD is recommending that we direct money toward a program that's targeted at engaging the most energy burdened and disadvantaged households in the solution, and so, specifically, we're proposing to engage the residential customers in disadvantaged communities in a straight-forward system with

1 a preference expressed for low-income
2 customers.

3 This would be a program that relies
4 on tech certification 24 hours in advance or
5 syncs up with a CAISO Flex Alert in
6 requesting a response if the household
7 intends to participate. For those who do,
8 press one to indicate that they would
9 participate.

10 (Alarm sounds.)

11 MS. LAZEROW: There would be a day-of
12 reminder, and then a day-after request for
13 certification of participation, a reminder
14 that meter data audit may occur.

15 ALJ STEVENS: Thank you, Shana. Your
16 time has expired. I apologize to have to cut
17 you off, but we'll have to move on.

18 MS. LAZEROW: Thank you.]

19 ALJ STEVENS: Thank you. At this time,
20 we are going to move on to the Emergency Load
21 Reduction Program and Demand Response
22 Modifications.

23 I'm realizing that we are -- we are
24 going in the order that we received the
25 request. So we're going to start with the
26 California Association of Small and
27 Multi-Jurisdictional Utilities.

28 Jed Gibson has two minutes. Jed,

1 your time will begin shortly, in a moment.

2 Actually, Jed, are you on the line?

3 MR. GIBSON: Yes, I'm ready.

4 ALJ STEVENS: Okay. Your time begins
5 now. Thanks.

6 ARGUMENT OF MR. GIBSON

7 Thank you. Jed Gibson for CASMU.

8 Based on the unique characteristics
9 of the CASMU members, the CASMU members' lack
10 of any formal Demand Response Program, as
11 well as the fact that there is no
12 demonstrable need to implement Demand
13 Response or load reduction requirements to
14 address reliability issues in the CASMU
15 members' service territories, any Demand
16 Response or load reduction requirements
17 adopted in this proceeding should not apply
18 to the CASMU members.

19 Thank you.

20 ALJ STEVENS: Great. Thank you.

21 Moving on, we have the Joint DR
22 Parties' represented by Jennifer Chamberlin.
23 Jennifer, are you on the line?

24 ARGUMENT OF MS. CHAMBERLIN

25 I am. Thank you, ALJ Stevens and
26 good morning, Commissioners. My name is
27 Jennifer Chamberlin.

28 I am the Executive Director of

1 Market Development for CPower and am here
2 today on behalf of CPower and Enel X North
3 America, Inc., two companies with long
4 experience in providing Demand Response and
5 distributed energy resources in California
6 that actively participated together in this
7 proceeding as the Joint DR Parties.

8 The expert testimony of myself and
9 Marc Monbouquette of Enel X admitted into
10 this record for the proceeding represents the
11 knowledge of increasing Demand Response,
12 therefore decreasing demand in extreme
13 weather conditions depends on customers,
14 contrary to their commercial interests,
15 taking the risk service demand quickly in
16 response to an emergency situation.

17 To that end, the Joint DR Parties
18 offered evidence that needed changes to the
19 Commission's and the IOUs' Demand Response
20 Programs that will encourage customers to
21 continue to take this risk, increase their
22 participation and avoid attrition.

23 We were, therefore, surprised and
24 disappointed that this expert testimony was
25 ignored by the Proposed Decision, where it
26 adopts changes to the utility-specifics DR
27 Programs based solely on utility testimony
28 and fails to address or seek to explain why

1 recommendations by the Joint DR Parties and
2 others and even some of those proposed by the
3 utilities did not even merit consideration.

4 While the PD's adopted Emergency
5 Load Reduction Program may have merit, if
6 modified, this is a new pilot mechanism that
7 will clearly take time to evolve. To this
8 end, the Proposed Decision should be modified
9 to expand the ELRP eligibility and remove the
10 \$10,000 or 10 megawatt-hour-minimum threshold
11 to receive compensation, which increases the
12 risk and will limit participation in an
13 untested program.

14 Its adoption certainly did not
15 warrant ignoring other critical modifications
16 to the existing DR Programs needed to
17 decrease demand during extreme weather
18 conditions.

19 The Proposed Decision's order
20 closing this proceeding by March 25th
21 suggests that those needed modifications will
22 not be accomplished by that date. If that is
23 the case, the Joint DR Parties strongly urge
24 the Commission to keep this proceeding open
25 to complete the beneficial work that was not,
26 but should have been undertaken, in this
27 Proposed Decision, within the next 60 days.

28 Such a request is highly reasonable

1 given the Proposed Decision's application to
2 the summers of 2021, 2022 and beyond.

3 Thank you very much.

4 ALJ STEVENS: All right. Thank you.
5 Let's move on to the Union of Concerned
6 Scientists represented by Adenike Adeyeye.

7 Adenike, are you on the line?

8 ARGUMENT OF MS. ADEYEYE

9 Yes. Thank you. Good morning,
10 Judge Stevens and Commissioners.

11 The Union of Concerned Scientists
12 supports the adoption of an ELRP and
13 expansion of DR Program, but we ask that the
14 PD maintain the Commission's existing ban on
15 prohibited resources in DR Program.

16 The Commission should not be using
17 this time to plan for the use of highly
18 polluting resources such as diesel backup
19 generation or diesel BUGs. Diesel BUGs were
20 approved for use in August 2020 in the midst
21 of a crisis, in the midst of blackouts, when
22 the state had to take urgent action to
23 prevent widespread power outages, but we're
24 not in that crisis right now. We are in a
25 position where we have time to plan and we
26 should not be planning on relying on
27 resources that accelerate climate change and
28 jeopardize the health of anyone living,

1 working or playing near facilities that use
2 these resources.

3 We need solutions that don't create
4 future problems. The Proposed Decision
5 should also focus on solutions that
6 prioritize preferred resources and benefit
7 disadvantaged communities and low-income
8 households.

9 For example, UCS supports expanding
10 the ELRP participant pool to include electric
11 vehicles and distributed energy resources, as
12 the Proposed Decision does. On allowing
13 groups of electric vehicles functioning as
14 virtual power plants to participate in the
15 ELRP creates an opportunity to learn valuable
16 lessons about how the electric -- how
17 electric vehicles can support the grid.

18 And along those same lines, the PD
19 should approve CEJA's proposed pilot that
20 would help reduce demand while providing
21 direct financial benefits to low-income
22 households at a pivotal time due to the
23 devastating economic impact of the pandemic.
24 The proposal is simple and straightforward
25 and was vetted by their members so UCS is in
26 support of that.

27 The Commission has the opportunity
28 to invest now in solutions that can help the

1 most impacted communities and help us all
2 avoid the worst of climate change. And UCS
3 supports the Commission taking advantage of
4 that opportunity. Thank you.

5 ALJ STEVENS: Thank you.

6 (Interjection by Court Reporter.)

7 ALJ STEVENS: Off the record.

8 (Off the record.)

9 ALJ STEVENS: On the record.

10 Next up with two minutes, we have
11 Nina Robertson with Sierra Club. Nina, are
12 you on the line?

13 ARGUMENT OF MS. ROBERTSON

14 Yes, thank you.

15 Building off of UCS's -- building
16 off of UCS's argument, I will focus on one of
17 the most egregious ELRP components contained
18 in the PD, which Commissioner Guzman Aceves
19 has also just flagged as problematic. And
20 that is the authorization of prohibited
21 resources, including diesel backup generation
22 or BUGs. The Commission must immediately
23 strike this from the decision. These dirty
24 resources are prohibited for a reason. They
25 emit toxic carcinogenic pollution that
26 disproportionately harms disadvantaged
27 communities.

28 As the American Lung Association has

1 found and it's detailed in Sierra Club's
2 testimony, there is no healthy threshold for
3 diesel particulate matter. Indeed, even
4 small increases in diesel PM can be deadly.

5 The Commission has already
6 considered the use of BUGs in Demand Response
7 Programs and after several years of analysis
8 concluded in no uncertain terms that BUGs
9 should be taken off the table entirely
10 because their health impacts are so severe.

11 Now without any justification and
12 without any record evidence, the Commission
13 has done a dramatic and dangerous about face,
14 even going so far as to authorize ratepayer
15 funding for BUGs. This is unlawful,
16 arbitrary and capricious decision-making at
17 its worst because it will directly harm
18 communities already burdened by pollution.

19 I am here to tell you that Sierra
20 Club and its members are horrified by the
21 Commission's support of diesel BUGs in this
22 decision.

23 Over 100 schools in California are
24 located within a thousand meters of a diesel
25 generator. CARB estimated that diesel BUGs
26 during PSPS events in October of 2019 alone
27 produced diesel PM equivalent to almost
28 29,000 heavy-duty diesel trucks driving in

1 California for one month. Even worse, unlike
2 trucks, these BUGs are stationary,
3 concentrating the pollution in close
4 proximity to where people live and breathe.

5 The Commission's unlawful,
6 unreasoned decision to further exacerbate
7 this harm is simply beyond the pale. The
8 Commission must therefore strike from the PD
9 the unlawful authorization of prohibited
10 resources.

11 Thank you.

12 ALJ STEVENS: Great. Thank you.

13 Moving on, we have three minutes for
14 the DR Coalition represented by Greg Wikler.
15 Greg, are you on the line?

16 MR. WIKLER: Yes, I am. Can you hear
17 me? Hello?

18 ALJ STEVENS: Yes, I can. Go ahead.

19 ARGUMENT OF MR. WIKLER

20 Okay. Good morning, Judge Stevens
21 and Commissioners.

22 My name is Greg Wikler and I am the
23 Executive Director of the California
24 Efficiency and Demand Management Council. I
25 have been a DR practitioner for more than
26 20 years dating back to the 2001 energy
27 crisis and have designed, implemented and
28 evaluated California's DR Programs during

1 that time. Thank you for giving me the
2 opportunity to speak today.

3 The DR Coalition consists of the
4 Council's 70-plus member companies, plus a
5 few additional DR companies. The Coalition
6 represents nearly all of California's
7 third-party DR providers.

8 I'd like to start out by expressing
9 our appreciation that the PD is proposing
10 significant enhancements to DR that we expect
11 will address emergency conditions this summer
12 and beyond. However, we're extremely
13 disappointed that the PD did not consider the
14 vast majority of the DR Coalition's
15 thoughtful and impactful proposals.
16 Countless resources and expertise went into
17 the development of our testimony, briefs and
18 comments, and for the Commission to not
19 consider our proposals is of significant
20 concern to the DR Coalition and many of our
21 -- of the stakeholders.

22 Now I would like to highlight a few
23 critical proposals that we are asking the
24 Commission to consider before it concludes
25 this proceeding.

26 Regarding the ELRP pilot, we believe
27 the proposed \$1,000 per megawatt energy
28 payment is too low and will not attract

1 sufficient levels of participation. We would
2 like to see a \$2,000 or higher energy payment
3 that we're confident will drive meaningful
4 participation for this pilot.

5 Another shortcoming of this pilot is
6 the 10-in-10 baseline with a 40
7 percent day-of adjustment. We recommend a
8 5-in-10 baseline with a 100 percent day-of
9 adjustment to ensure that participant
10 performance is accurately and equitably
11 measured.

12 Regarding the Capacity Bidding
13 Program, we believe the PD should approve
14 SCE's and PG&E's requests to increase CBP
15 incentives, just as proposed for BIP.
16 Further, the PD should approve PG&E's request
17 for a CBP Weekend Option.

18 Now I will briefly address
19 market-based DR. The PD ignored two critical
20 proposals. First is the 8.3 percent DR
21 procurement cap. IOU DR allocations count
22 first towards the cap leaving little room for
23 third-party DR. It's unjust and contrary to
24 prior Commission decisions for IOU DR
25 Programs to receive preferential treatment
26 and crowd out third-party providers. We ask
27 that the LSE-specific cap on DR procurement
28 be waived until this issue can be addressed

1 in the RA proceeding.

2 Second is the treatment of DR
3 baselines in RA. We have detailed how
4 baseline calculation deficiencies led to
5 inaccuracies during last summer's extreme
6 heat events. We are asking for a temporary
7 waiver of the day-of adjustment cap while
8 this issue is addressed by the Commission.
9 We have spoken with the CAISO about this
10 problem and they are open to making tariff
11 adjustments. We encourage the Commission to
12 follow CAISO's lead.

13 In summary, we believe the PD has
14 left unaddressed many other promising DR
15 proposals. Rather than close this
16 proceeding, the DR Coalition urges the
17 Commission to keep this proceeding open and
18 consider another tranche of DR proposals that
19 can be approved for deployment later this
20 year and in time to meet reliability needs
21 for summer of 2022.

22 Thank you, again, for allowing the
23 DR Coalition to speak.

24 ALJ STEVENS: Great. Thank you.

25 Next up with two minutes, Google
26 representative, Aaron Berndt. Aaron.

27 MR. BERNDT: Yes, I am. Can you hear
28 me?

1 ALJ STEVENS: Yes, I can. Go ahead.

2 ARGUMENT OF MR. BERNDT

3 I am Aaron Berndt. I work for
4 Google.

5 (Poor Audio Quality - Indecipherable.)

6 ALJ STEVENS: Mr. Berndt, I believe we
7 have a connection issue. Can you check your
8 audio one more time?

9 MR. BERNDT: Can you hear me?

10 ALJ STEVENS: You know what, I think
11 you have spotty reception. Are you able to
12 call in on a different line?

13 MR. BERNDT: Unfortunately, I am not.

14 ALJ STEVENS: Okay. Let's try it one
15 more time. Could you please test your audio
16 real quick?

17 MR. BERNDT: Yes. Is that okay?

18 ALJ STEVENS: Unfortunately it's not.
19 I don't believe that the connection is
20 sufficient to allow the court reporter to
21 transcribe.

22 COMMISSIONER GUZMAN ACEVES: Maybe you
23 can try your speaker.

24 ALJ STEVENS: Maybe without the head
25 phones or something, that might work better.

26 MR. BERNDT: I'm sorry.

27 ALJ STEVENS: Unfortunately, we're
28 going to have to move on. What I will do is

1 I'll -- if you want to maybe try to get
2 better reception, we will try to get you two
3 minutes at the end, but we do need to move
4 on. Let's maybe try one more time.

5 MR. BERNDT: Could you hear me now?

6 ALJ STEVENS: Yes, we can.

7 MR. BERNDT: Okay. Oh, yeah. I will
8 try to keep it brief. As, you know, AC
9 represents --

10 ALJ STEVENS: Hold on. What I am going
11 to do is I am going to restart the clock and
12 then I will go back on the record and restart
13 the clock and then you may continue. So on
14 the record.

15 MR. BERNDT: Thank you, your Honor.

16 ALJ STEVENS: Go ahead.

17 ARGUMENT OF MR. BERNDT (Resumed)

18 I am Aaron Berndt. I work for
19 Google supporting our Nest Thermostat
20 partnerships.

21 We work with our partners to help
22 accelerate their energy efficiency and Demand
23 Response goals.

24 As you know, AC represents
25 31 percent of electricity demand in
26 California, and residential AC usage is a
27 major driver of peak and net-peak demand
28 during heat storms and could be managed

1 through DR Programs with Smart Thermostats.

2 The stated goal of the OIR is to
3 increase load reduction potential for summers
4 of 2021 and 2022, but the Proposed Decision
5 essentially left out solutions to address the
6 residential sector completely by not
7 accelerating Smart Thermostat based DR
8 Programs.

9 In our written comments, we
10 highlighted our recommendation to first adopt
11 PG&E's BYOD proposal to add 70,000 Smart
12 Thermostats and 25 megawatts of capacity
13 during its three-year proposed pilot period;
14 and second to adopt the DR Coalition's
15 proposal from its opening testimony to enable
16 third-party facilitation of rebates.

17 Both of these steps would have a
18 significant impact on California Demand
19 Response load potential and in short order.

20 Today I would like to highlight a
21 couple of things, particularly of PG&E's
22 pilot proposal.

23 First, the program model PG&E is
24 proposing to launch ASAP has proven all
25 across the country as a way to quickly get
26 customers enrolled in Demand Response
27 Programs.

28 For all parties involved, it would

1 be quickly to stand up across device
2 manufacturers, their DERMS partner and PG&E.

3 The program approach has been
4 well-proven by dozens and dozens of programs
5 all across the country and would be a major
6 missed opportunity not to enroll thermostats
7 that are already on customers' walls to help
8 balance California's grid.

9 And second, there may be concerns
10 by the Commission that PG&E's program is not
11 needed because third-party programs are
12 already live in their territory. With over a
13 million thermostats already -- Smart
14 Thermostats already installed in California
15 and another 6 million potential, we firmly
16 believe that there can be both competitive
17 third-party programs and IOU programs at
18 scale and customers will naturally be looking
19 for solutions that best fit their needs.

20 Thank you.

21 ALJ STEVENS: Off the record.

22 (Off the record.)

23 ALJ STEVENS: On the record. Next up
24 is Polaris Energy Systems with three minutes.
25 We have David Meyers representing.

26 David, are you on the line?

27 MR. MEYERS: Yes, I am. Good morning.

28 ALJ STEVENS: Thank you. Go ahead.

ARGUMENT OF MR. MEYERS

Good morning. My name is David Meyers. I am the CEO of Polaris Energy Services, the leader in Agricultural Demand Flexibility, with more than 500 irrigation pumps in California on our network and 65 megawatts of curtailable load. We are an EPIC grantee and recently completed a three-year exhaustive report on Technologies and Strategies for Agricultural Load Management to Meet Decarbonization Goals.

The meme going around shows a drawing of a World War II bomber with an "X" where planes returned with hits from anti-aircraft fire. A smart engineer suggested reinforcing the planes in those spots where they took fire. A smarter engineer suggested reinforcing all the other spots because planes hit in those places did not return.

Agricultural DR is the bomber that did not return. Despite clear data showing its potential, the Proposed Decision, along with industry and generic media, focus heavily on easy-to-grasp, front-of-mind end uses and companies. But we need to look for load and load flexibility where they reside. Ratepayers have spent at the Commission's

1 direction or with its approval more than
2 \$10 million to quantify, characterize and
3 test the agricultural demand flexibility
4 opportunity, showing it to be the largest
5 resource after commercial buildings, and to
6 identify the steps to exploiting it by
7 modifying existing programs or developing new
8 market constructs.

9 Polaris is proud to participate in
10 these efforts but also believes that ag
11 energy users and all ratepayers need and
12 deserve to see analysis turned into action.
13 We ask that the Commission address the
14 proposals and testimony that we have filed
15 and it has been supported by agricultural
16 energy users and numerous other parties.

17 1. The new time-of-use rates are
18 designed well and we are seeing significant
19 interest from growers. However, they are
20 designed as alternatives to DR, not
21 complementary. Even customers who respond to
22 them may be running significant loads and be
23 unavailable to the grid when needed most.
24 This is easy to fix and should be fixed now.

25 2. Automation incentives are the
26 gateway drug of agricultural DR and the ag
27 sector is starting up the steep slope of its
28 automation adoption --

1 ALJ STEVENS: Off the record.

2 (Off the record.)

3 ALJ STEVENS: Okay. On the record.

4 MR. MEYERS: Automation incentives are
5 the gateway drug of agricultural DR and the
6 ag sector is starting up the steep slope of
7 its automation adoption curve now.

8 Ensuring that the demand flexibility
9 is inherent in the solutions adopted is a
10 once-in-a-generation opportunity that should
11 not be missed. The IOUs proposed eligibility
12 of BIP and ELRP for AutoDR incentives and
13 modifications to simplify payment and ensure
14 longer-term participation in DR in exchange
15 for those incentives. Those proposals should
16 be adopted.

17 The biggest obstacle to ag sector
18 participation in Demand Response is that
19 programs like CBP and DRAM require that
20 farmers forecast their operations up to six
21 weeks in advance. Participation and
22 performance would be higher with a baseline
23 that measures curtailment, not forecasting
24 prowess. Our proposal would fix this and
25 should be adopted.

26 To Commissioner Guzman Aceves'
27 question, BIP participation can be increased
28 and attrition reversed by reducing penalties,

1 rather than increasing compensation. The
2 risk now is excessive and disconnected from
3 the value of the energy consumed; our farmers
4 performed at 85 percent in BIP events last
5 summer day after day and lost their entire
6 year's payments. Thank you.]

7 ALJ STEVENS: Thank you.

8 Moving on, we have the Center For
9 Energy Efficiency and Renewable Technology --
10 I will remind you, again, it's hard to even
11 perceive some of these communications when
12 they're going too fast. So, please, do your
13 best to speak slowly -- represented by
14 V. John White. Are you available?

15 ARGUMENT OF MR. WHITE

16 I am. Good morning, and thank you
17 for having me. We appreciate the Commission
18 granting our request for Oral Argument. We
19 think this is an important proceeding, and
20 there needs to be more transparency and more
21 engagement by the Commissioners. So we are
22 grateful for this moment.

23 My name is V. John White. I am the
24 Executive Director of the Center for Energy
25 Efficiency and Renewable Technologies also
26 known as CEERT.

27 CEERT has worked for over 30 years
28 to combat climate change and promote clean

1 energy resources, including long-standing
2 advocacy before the CPUC.

3 The OIR, scoping memo, and more
4 recently, President Batjer committed this
5 proceeding to adopting measures to advance
6 and increase the Demand Response and
7 distributed energy resources as priority
8 resources to decreased demand during extreme
9 weather events in the summers of 2021 and
10 2022.

11 This commitment is particularly
12 appropriate where Demand Response was a
13 significant help when the August 2020 heat
14 event occurred. I recall that Friday evening
15 when the blackout started, the conversation
16 among a lot of folks was, It's going to be
17 worse on Monday and Tuesday. We're going to
18 have really severe blackouts.

19 And, yet, Southern California Edison
20 and their customers moved 4,000 megawatts off
21 the grid in a way that saved us.

22 And so this is why we think Demand
23 Response and (inaudible) stability is so
24 important, but instead of meeting that
25 commitment, the Proposed Decision presents a
26 crippling response to Demand Response and
27 DERs by failing to even consider proposals by
28 industry leaders and even the utilities,

1 which are needed to increase these resources,
2 and in turn decrease demand.

3 Worse, the Proposed Decision shuts
4 down this proceeding for any further
5 consideration of these Demand-side Response
6 proposals, while instead increasing
7 California's reliance on gas generation
8 beyond what has already been adopted in the
9 first decision in this proceeding.

10 (Alarm sounds.)

11 MR. WHITE: It is now unclear to CEERT
12 whether the CPUC wants to advance DERs,
13 including DR, especially to decreased demand
14 in extreme weather events where the Proposed
15 Decision provides no pathway forward to do
16 so. Because there's no time left for the
17 CPUC to issue an alternate service --

18 (Crosstalk.)

19 MR. WHITE: -- proposal, the Commission
20 must modify Proposed Decisions, direct this
21 OIR remain open to finish the job --

22 (Crosstalk.)

23 MR. WHITE: -- of meaningful Demand
24 Response measures.

25 ALJ STEVENS: Next up, we have the
26 Utility Reform Network, represented by
27 Michael Florio with two minutes. Michael,
28 are you available?

1 MR. FLORIO: Hello. Can you hear me?

2 ALJ STEVENS: Yes, I can. Go ahead.

3 ARGUMENT OF MR. FLORIO

4 Great. Thank you. Thank you, Judge
5 Stevens, and Commissioners.

6 TURN seconds many of the comments
7 you heard already from the Demand Response
8 parties. The Commission has moved with
9 remarkable speed in this proceeding, but in
10 the process a mountain of very good testimony
11 has been left on the cutting room floor.

12 There's only so much you can do in
13 the time you had, but we strongly support the
14 argument that this proceeding should be kept
15 open to focus on Demand Response
16 opportunities for 2022. You've got a huge
17 record that has not even been touched upon by
18 the Proposed Decision so far.

19 Also, looking at the utilities'
20 comments, it looks like many aspects of the
21 proposed ELRP will be delayed beyond this
22 summer, but the record has a number of
23 proposals that can be adopted right away and
24 effective for summer 2021. That includes
25 PG&E's Residential Rewards Pilot, the
26 utilities' proposed changes to the capacity
27 bidding program, and the Demand Response
28 Coalition's proposal to let aggregators at

1 their own risk issue Smart Thermostat
2 incentives to their customers.

3 The other reason to keep this
4 proceeding open is that we have in November
5 of this year upcoming new applications for
6 five-year Demand Response Programs that in
7 the past the Commission has issued a guidance
8 decision in advance of those applications --

9 (Alarm sounds.)

10 MR. FLORIO: -- to give policy
11 direction. That guidance, there's no --

12 ALJ STEVENS: Mr. Florio, we're going
13 to have to conclude. Thank you for your
14 comments.

15 MR. FLORIO: Okay.

16 ALJ STEVENS: Moving on. I do
17 apologize.

18 I skipped San Diego Gas & Electric.
19 So we're going to go back to that party
20 represented by Alex Kim with three minutes.

21 Alex, are you on the line?

22 MR. KIM: I am. Can you hear me?

23 ALJ STEVENS: Yes, I can. Go ahead.

24 ARGUMENT OF MR. KIM

25 Thank you. Good morning, Judge
26 Stevens, and the Commissioners. Thank you
27 for the opportunity.

28 The PD directs the IOUs to develop

1 and administer an Emergency Load Reduction
2 Program or ELRP, as a pilot designed to
3 prevent this type of rotating outages that
4 occurred in summer 2020.

5 SDG&E supports the concept of the
6 ELRP; in fact, SDG&E proposed its Emergency
7 Load Shed Pilot, or ELSP, immediately
8 following the heat storms in August 2020 to
9 serve the same purpose as the ELRP. The ELRP
10 is broader in scope than SDG&E's proposed
11 ELSP. It includes several additional
12 customer subgroups --

13 ALJ STEVENS: Off the record.

14 (Off the record.)

15 ALJ STEVENS: You have two minutes and
16 30 seconds. We'll go back on the record.

17 Mr. Kim, can you hear us?

18 (No response.)

19 ALJ STEVENS: All right. Off the
20 record.

21 (Off the record.)

22 ALJ STEVENS: On the record. We had a
23 connection issue with SDG&E. We will be
24 granting them two minutes and 30 seconds
25 after Pacific Gas & Electric Company. At the
26 moment we're going to move on to the
27 California Independent System Operator
28 represented by Mr. Pinjuv with two minutes.

1 Please, go ahead.

2 ARGUMENT OF MR. PINJUV

3 Thank you, Judge Stevens. Jordan
4 Pinjuv with the California Independent System
5 Operator. The ISOs strongly support the ELRP
6 program as proposed in this decision, and the
7 ISO specifically appreciates that the
8 Proposed Decision notes that this will be an
9 insurance program outside the existing
10 Resource Adequacy program.

11 The coordination is key for the ELRP
12 to be successful. To that end, the ISOs look
13 forward to working with the IOUs to
14 understand the impact of both reliability and
15 the markets for summer 2021.

16 With respect to Demand Response
17 Programs, the ISO provides one comment on the
18 Base Interruptible Program specifically. The
19 ISO agrees with the Proposed Decision that
20 the Base Interruptible Program, or BIP,
21 resources should not be eligible to be called
22 for ELRP-only events. The BIP resources are
23 procured as RA capacity, and they need to be
24 available when called upon by the ISO,
25 allowing the BIP resources to participate in
26 ELRP-only events could deplete those
27 resources if they're later needed for the
28 ISOs. But the result, the ISO does not

1 support changing the decision -- the decision
2 to date as it is and not allow BIP resources
3 to participate in ELRP-only events.

4 Thank you.

5 ALJ STEVENS: Thank you.

6 If Mr. Kim is on the line, be aware
7 we'll grant you 2.5 minutes after PG&E.

8 Let's move on to Southern California
9 Edison represented by Katie Sloan.

10 Katie, are you on line?

11 MS. SLOAN: Yes, I am here.

12 ALJ STEVENS: Go ahead.

13 ARGUMENT OF MS. SLOAN

14 Thank you, again, for your time.
15 First, I'm going to talk about the proposed
16 Emergency Load Reduction Program SCE made
17 relative to the guidance given in the
18 Proposed Decision. SCE understands the
19 reliability risks that we are facing this
20 summer and we are very supportive of standing
21 up an ELRP in time to meet summer weather
22 events.

23 SCE's ELRP proposal is a
24 straight-forward pilot that features maximum
25 flexibility in terms of calling events. The
26 simple design and dispatch flexibility was
27 intentional. We believe we can deliver it by
28 this summer, and it will address a variety of

1 emergency scenarios based off our experience
2 in 2020.

3 Based on this past experience, there
4 is no way SCE can run such a pilot on a
5 manual basis, which is why our teams began to
6 work on IT systems in alignment with the
7 proposals we made in January to meet a June
8 online date.

9 While we appreciate the thought that
10 went into the pilot outlined in the Proposed
11 Decision, we have concerns over certain
12 elements and want to be clear: As written,
13 it is not an implementable design for this
14 summer or potentially for the future. If all
15 customer groups and options in the Proposed
16 Decision are included, the complex program
17 elements cannot be implemented by summer at
18 all.

19 We also ask for reconsideration of
20 the settlement method around dual
21 participating customers from the Base
22 Interruptible Program and Agricultural and
23 Pumping Interruptible Programs.

24 SCE is asking the CPUC to approve
25 SCE's proposed ELRP so that we can meet the
26 June online goal we set.

27 I'll turn my attention now to the
28 Virtual Power Plant Pilot. We would really

1 appreciate if the Commission would approve
2 the pilot that we proposed. Again, it is an
3 implementable, flexible solution.

4 Thank you for your time.

5 ALJ STEVENS: Thank you.

6 Next up is the California Energy
7 Storage Alliance, represented by Jin Noh.

8 Jin, are you on the line?

9 MR. NOH: Yes. Can you hear me?

10 ALJ STEVENS: Yes, I can. Please, go
11 ahead.

12 ARGUMENT OF MR. NOH

13 Thank you, your Honor. This is Jin
14 Noh with the California Energy Storage
15 Alliance.

16 We understand that the Commission's
17 in a tough situation to identify short-term
18 reliability solutions for summer 2021 and
19 2022, and this balance becomes tougher with
20 the need to move quickly in direct action
21 with enough lead time to address these events
22 while still giving enough time to implement.

23 With this mind, CESA strongly
24 supported this proceeding's focus on
25 demand-side measures, which we view as
26 representing a range of clean solutions that
27 could actually be procured and delivered in
28 relatively short order.

1 To this end, CESA generally
2 supported the ELRP for a number of reasons
3 expressed in our comments. It falls short of
4 our vision for an ELRP, but as a five-year
5 pilot, we're hoping that it represents a good
6 starting point for further refinements over
7 time.

8 In particular, we appreciate the
9 Commission's inclusion of Rule 21, exporting
10 DERs and VPPs as eligible customer and
11 resource types. Many behind-the-meter energy
12 storage resources and vehicle-to-grid
13 resources in particular have stranded export
14 capacity that could be delivered if not for
15 the lode limitations under the Demand
16 Response construct and the lack of
17 compensation for exports. This stranded
18 capacity could be delivered as soon as
19 possible by summer 2021.

20 So despite arguments to the
21 contrary, we strongly urge against delayed
22 implementation to summer 2022 for enabling
23 exports. We, instead, advocate for phased
24 implementations over time.

25 In the immediate term, with changes
26 that could encourage greater customer
27 participation with a reservation payment or
28 higher energy payment.

1 And to conclude, we concur with the
2 recommendations to keep this proceeding open
3 to address refinements and program design
4 details to ensure the success of the ELRP and
5 to address other demand-side proposals that
6 were not sufficiently discussed or assessed.

7 ALJ STEVENS: Moving on, we have
8 Pacific Gas & Electric Company represented by
9 Fabienne Arnoud.

10 Fabienne, are you on the line?

11 MS. ARNOUD: Yes. Can you hear me?

12 ALJ STEVENS: Yes, I can. Go ahead.

13 ARGUMENT OF MS. ARNOUD

14 On this topic PG&E would like to
15 call attention to three points: First, PG&E
16 would appreciate reconsideration of its
17 proposed Residential Rewards Pilot because it
18 has the potential to provide incremental load
19 reduction as early as the summer.

20 PG&E has identified a vendor to
21 quickly implement a turnkey solution that
22 leverages the 450,000 Smart Thermostats
23 already installed in our service territory.
24 We also note that the Proposed Decision
25 approved similar programs for both SCE and
26 SDG&E and that the Residential Rewards Pilot
27 is supported by Google, Ecobee, TURN,
28 OhmConnect and the DR Coalition.

1 Second, PG&E is supportive of the
2 ELRP and is already working with the vendors
3 to quickly stand up the program, but to
4 minimize execution risk for the enrollment of
5 megawatts this summer, PG&E is recommending
6 the deferral of only the most complex program
7 component.

8 And, additionally, given the
9 expanded scope of ELRP, PG&E is requesting
10 authorization of two-way balancing account
11 instead of one-way balancing account.

12 And, lastly, PG&E has two additional
13 recommendations for its Capacity Bidding
14 Program, or CBP. The first is to approve a
15 weekend option since the CBP is currently
16 only Monday through Friday, and as we've
17 experienced, emergencies can happen over the
18 weekend.

19 And, second, PG&E recommends placing
20 a temporary cap on bid prices for CBP to
21 increase the likelihood of these resources
22 being dispatched in the CAISO market in
23 situations of great emergency.

24 Thank you.

25 ALJ STEVENS: Thank you. Moving on, we
26 have 2.5 minutes of recap for SDG&E with the
27 line disconnection.

28 Alex Kim, are you ready?

1 MR. KIM: I am back on, Judge Stevens.

2 ALJ STEVENS: Thank you. Go ahead.

3 ARGUMENT OF MR. KIM

4 The ELRP is broader in scope than
5 SDG&E's proposed Proposed Emergency Load Shed
6 Pilot. It included several additional
7 customer subgroups, each with differing
8 program parameters, which add complexity and
9 cost to the implementation of the program.

10 SDG&E designed its ELSP to stay
11 within its existing DR program budget and to
12 work around current technology limitations
13 related to implementation of its new Customer
14 Information Systems, CIS.

15 For example, SDG&E proposed ELSP
16 that includes only commercial and industrial
17 customers with a 100 kilowatt load drop. The
18 eligibility limitation means that the pilot
19 can be operable this summer with current DR
20 program funding by using a manual settlement
21 process while SDG&E's new CIS is implemented.

22 SDG&E's ELSP can be operable by June
23 20, 2021, as ordered in the PD, by only
24 including those customers proposed in our
25 ELSP, which includes groups A1 and A3,
26 provided there's a 100 kilowatt threshold.

27 Including the remaining groups, as
28 defined in the PD, will require modifications

1 to SDG&E's CIS to automate settlements and
2 address the additional complexity.

3 These changes can be implemented by
4 May 2022 to include the remaining groups;
5 therefore, SDG&E would respectfully request
6 the Commission revise the PD to allow SDG&E
7 to implement its Emergency Load Shed Pilot by
8 June 20, 2021, and fully implement the
9 Emergency Load Reduction Program by May 2022.

10 The PD also directs the IOUs to
11 establish a one-way balancing account capping
12 SDG&E's administrative cost \$1.6 million and
13 for the ELRP to be for a duration of five
14 years.

15 As discussed in SDG&E's opening
16 comments, it is concerned regarding the lack
17 of evidence supporting the proposed
18 administrative budget. The record does not
19 contain adequate cost information and no cost
20 analysis was performed.

21 Costs of pilot programs can be
22 difficult to predict as they are by their
23 very nature without precedent. A one-way
24 balancing account does not address the
25 potential for program implementation costs to
26 exceed authorized amounts over the five-year
27 period of a pilot.

28 SDG&E respectfully requests the PD

1 be revised to allow for a new two-way
2 balancing account for the Emergency Load
3 Reduction Program. This will address the
4 uncertainty and avoid the need for the
5 Commission to address multiple, individual
6 advice letters, which likely would be
7 necessary under the PD as it's written today.

8 Thank you for the time. This
9 concludes my comments.]

10 ALJ STEVENS: Thank you. At this time,
11 we will move on to the Planning Reserve
12 Margin, capacity, procurement and
13 interactions with the Integrated Resource
14 Plan.

15 We're going to start with the
16 California Association of Small and
17 Multi-Jurisdictional Utilities represented by
18 Jed Gibson. Jed, are you on the line?

19 MR. GIBSON: Yes. Thank you, your
20 Honor.

21 ARGUMENT OF MR. GIBSON
22 Jed Gibson for CASMU.

23 As outlined in earlier comments and
24 the CASMU members' undisputed testimony, the
25 CASMU members did not face the same
26 challenges as other load-serving entities
27 during 2020 extreme weather events and are
28 not expected to face similar challenges in

1 2021 or going forward, in the event of
2 extreme weather events.

3 Accordingly, there is no need for
4 additional capacity procurement for any of
5 the CASMU members, even in the event of
6 extreme weather or heat therm. Thank you.

7 ALJ STEVENS: Thank you. Next we have
8 the Independent Energy Producers Association
9 represented by Brian Cragg. Brian, are you
10 on the line?

11 MR. CRAGG: Yes I am, your Honor.

12 ALJ STEVENS: Go ahead.

13 ARGUMENT OF MR. CRAGG

14 Thank you. Good morning, your Honor
15 and Commissioners. I am Brian Cragg
16 representing IEP.

17 The August outages presented the
18 Commission with the difficult challenge of
19 determining how to maintain reliability and
20 affordable -- affordability, while making
21 continued progress towards carbon reductions
22 and other policy goals.

23 The immediate challenge the August
24 outages presented the Commission was the
25 challenge of ensuring reliability for
26 summer 2021 and 2022 in the face of
27 unpredictable effects of climate change by
28 reducing demand and increase in supply of

1 electricity.

2 To further complicate things, little
3 time was available. At this point, summer of
4 '21 is only about 15 weeks off. It's
5 extremely difficult to develop additional
6 supply resources with so little time.

7 The Proposed Decision is correct
8 when it allows utilities the discretion to
9 search broadly for potential sources of
10 increased supply and not to exclude types or
11 any technologies from consideration.

12 Some parties object, sometimes
13 vehemently, to even a consideration of
14 incremental capacity from existing gas-fired
15 resources.

16 But in reviewing those objections,
17 the Commission should keep several points in
18 mind.

19 First, consideration is not
20 commitment. Looking at resources doesn't
21 mean that the utilities will contract with
22 them. Incremental capacity from gas-fired
23 resources should be selected only if it is
24 among the best options for ensuring
25 reliability.

26 Second, if they are selected,
27 incremental gas-fired capacity won't have
28 added emissions, unless it actually runs, and

1 won't run unless it's actually needed for
2 reliability. And if incremental capacity is
3 a result of efficiency upgrades at the unit,
4 no additional emissions will result if they
5 do run.

6 In addition, all gas-fired plants in
7 California are subject to strict air quality
8 requirements established by CARB and the
9 local air quality management districts.

10 Third, California has 24 more years
11 to reach the zero net carbon goals
12 established by SB 100.

13 The small quantity of additional
14 resources needed for emergency reliability
15 for '21 and '22 will not delay or hinder
16 California's steady progress towards SB 100's
17 goals.

18 The recent SB 100 report had some
19 interesting facts that are relevant to
20 discussion today.

21 First, the electric sector is
22 responsible for about 15 percent of statewide
23 greenhouse gas emissions and only nine
24 percent of that comes from in-state
25 resources. Compare that to 41 percent
26 contribution of the transportation sector.

27 Second, greenhouse gas emissions
28 from the electric sector dropped more than

1 40 percent since 2000. If other sectors had
2 done that well, we would be in a lot better
3 shape today.

4 The report also concluded that gas
5 capacity is currently the most economic
6 option to meet reliability needs.

7 This is the situation we're in.
8 This is the reality we have to deal and IEP
9 urges the Commission to adopt the PD as
10 written.

11 Thank you very much.

12 ALJ STEVENS: Thank you. Moving on,
13 next we have the California Community Choice
14 Association. I received an indication that
15 they would like to cede their time. However,
16 the ruling did grant them three minutes. So
17 I will open the floor up to the California
18 Community Choice Association, if they are on
19 the line.

20 (No response.)

21 ALJ STEVENS: Hearing no response, we
22 will move on to Peterson Energy Systems with
23 three minutes represented by Barry Kreuzer.
24 Barry, are you on the line?

25 MR. KREUZER: Yes, I am. Can you hear
26 me, Judge?

27 ALJ STEVENS: Yes I can. Go ahead.

28 ///

1 ARGUMENT OF MR. KREUZER

2 Good morning, President Batjer,
3 Commissioners, Administrative Law Judge
4 Stevens.

5 Peterson Power Systems appreciates
6 this opportunity to provide Oral Argument
7 this morning.

8 My name is Barry Kreuzer. I am the
9 General Manager of Peterson Power Systems.
10 Peterson Power Systems is an exclusive
11 Caterpillar dealer.

12 All of this talent and expertise is
13 assembled here today to make sure that the
14 lights stay on in California in the likely
15 event of extreme weather, specifically in the
16 summers of 2021 and 2022.

17 The root cause of the recent
18 blackouts is an imbalance of supply and
19 demand that occurs several times per day on a
20 system that was designed for constant mode of
21 operation.

22 The CPUC is correct in addressing
23 the issue from both sides of the equation.
24 Peterson's solutions address the supply side
25 of the challenge and our solutions provide
26 demand capacity when needed, where it is
27 needed and for however long it is needed.

28 Peterson's solutions includes

1 temporary XQ1475 kW gensets that are in
2 expandable nodes of continuous power that is
3 capable of utilizing renewable natural gas
4 and Hydrogen blend fuels today. And it's
5 rapidly deployable and available.

6 We also offer Transitional-2,500
7 kilowatt Hybrid system, which is also
8 expandable and combines energy storage
9 systems for zero emissions spinning reserve
10 paired with highly-efficient gensets that are
11 20 percent more efficient than the existing
12 natural gas fleet today and capable -- also
13 capable of running on RNG and Hydrogen fuel
14 blends today, deployable in months and not
15 years.

16 Both represent best-fit, least-cost
17 solutions that can be deployed quickly and
18 can be combined with renewable wind and solar
19 generation to maximize their environmental
20 benefits.

21 The inevitable elimination of the
22 OTC plants and the plant shutdown of Diablo
23 Canyon will greatly amplify the capacity
24 problem in California in the coming years.

25 SB 100 provided a significant
26 glidepath for de-carbonization, recognizing
27 that technologies needed to achieve
28 de-carbonization goals are nascent,

1 cost-prohibitive or do not yet exist.

2 We fully support California's clean
3 energy bills, but we want to keep the lights
4 on as we move towards those goals.

5 The no-gas mantra of several parties
6 in this proceeding is not helpful in the
7 absence of other solutions and is in contrary
8 to the structure and timelines set forth by
9 SB 100.

10 We recognize the role of gaseous
11 technologies can play today and over the next
12 few years, while we focus on replacement of
13 natural gas with renewable and superior
14 fuels.

15 Re-treading the old, inefficient
16 legacy gas fleet in California which has been
17 proposed, is not the best path forward.
18 Employing a distributed network of energy
19 storage, renewable fuels is the path forward.

20 Thank you for the opportunity to
21 present our testimony today. I will forward
22 -- I will forward my transcript.

23 ALJ STEVENS: Thank you. Moving on,
24 next we have the Joint DR Parties represented
25 by Jennifer Chamberlin with two minutes.
26 Jennifer, are you on the line?

27 ARGUMENT OF MS. CHAMBERLIN

28 I am. Thank you, ALJ Stevens and

1 good morning again, Commissioners.

2 In addition to the DR program
3 changes that we mentioned previously, there
4 are several recommendations espoused by the
5 Joint DR Parties throughout this proceeding
6 that must be included in the final decision
7 to ensure that DR and DER resources are
8 provided a meaningful opportunity to provide
9 reliability to the grid, rather than having
10 California simply rely on additional gas
11 resources.

12 The RA proceeding has set a cap to
13 the maximum cumulus capacity buckets on the
14 amount of DR capacity that any one LSE can
15 have in its portfolio at 8.3 percent. Under
16 this per-LSE cap are allocations from the
17 utility programs and procurements of Demand
18 Response to non-IOU LSEs. This proceeding
19 must, for at least 2021 and 2022, allow this
20 cap to either be a statewide cap rather than
21 apply individually to each LSE, or in the
22 alternative make it be an LSE-specific cap,
23 but which does not have allocated resources
24 from IOU program and procurements count
25 towards it, particularly as the expansion of
26 the utility emergency programs will further
27 erode the very-limited opportunity for
28 third-party resources to participate in RA.

1 Measurement of DR and
2 behind-the-meter distributed energy resources
3 is a critical component to how these
4 resources are evaluated and shown to
5 contribute filling grid resource needs. The
6 current measurement protocols, baseline
7 methodologies, did not perform well in last
8 summer's heat events. Significant testimony
9 was provided by the Joint DR Parties, TURN,
10 Southern California Edison and others to seek
11 a more appropriate measurement methodology.
12 Properly recognizing the contributions of the
13 customers who participate in these resources
14 are critical to ensuring these resources are
15 available as we continue to move towards our
16 state climate goals.

17 The Joint DR Parties recommend that
18 this issue be incorporated into a
19 continuation of this proceeding, both to
20 better recognize customer participation in
21 2021 and 2022 and to inform the IOUs' DR
22 applications be filed later this year.

23 Thank you very much.

24 ALJ STEVENS: Thank you. Moving on, we
25 have the Union of Concerned Scientists
26 represented by Adenike Adeyeye. Adenike, are
27 you available?

28 ///

1 ARGUMENT OF MS. ADEYEYE

2 Yes. Thank you. Thanks. And,
3 sorry, daycare is closed today.

4 The Union of Concerned Scientists
5 opposes the planning reserve margin --
6 opposes changing the planning reserve margin
7 in this proceeding. And the proceeding
8 scoped as an emergency proceeding was
9 designed to address reliability issues for
10 summer 2021 and 2022. But the proposed
11 decision would change the planning reserve
12 margin indefinitely until another Commission
13 decision supercedes it. The planning reserve
14 margin is typically addressed in the resource
15 adequacy proceeding and this proceeding
16 should not introduce yet another venue that
17 runs counter to the idea of streamlined
18 organized planning, especially when our goal
19 here is to address, at worst, potential
20 shortfall identified in September only. The
21 Proposed Decision can address reliability
22 without changing the planning reserve margin.

23 And along the same lines, the
24 Proposed Decision should limit procurement to
25 resources that are aligned to California's
26 policies and not relying on additional
27 investments in natural gas. Specifically,
28 long-term contracts for incremental gas

1 generation should be prohibited as outside
2 the scope of this proceeding. Five year or
3 longer investments in incremental gas
4 generation will make it more difficult for
5 California to comply with state policy.

6 And, in addition, the proposed
7 decision should prohibit repowering gas
8 plants for the same reason. UCS has recently
9 published modeling showing that, if anything,
10 the Commission needs to accelerate the
11 transition to zero carbon resources to meet
12 SB 100 and SB 1090 requirements.

13 And this is a critical moment, so
14 investing in repowering old plants would not
15 only hinder our efforts to comply with those
16 laws, but also risk accelerating climate
17 change by increasing reliance on burning
18 fossil fuels, which will only increase the
19 risk of extreme weather events in the future.

20 Thank you.

21 ALJ STEVENS: Thank you. We will move
22 on to Sierra Club with Nina Robertson. Nina,
23 are you available?

24 ARGUMENT OF MS. ROBERTSON

25 Yes. Thank you. I will focus my
26 time on the PD's reckless and unlawful
27 authorization of gas plant repowering. This
28 part of the decision is divorced from fact

1 and law and it will do nothing to keep the
2 lights on in 2021 or even 2022. It will
3 perpetuate environmental injustice because
4 California's gas leaks disproportionately
5 impact vulnerable communities. Building new
6 gas capacities at these sites will continue
7 that injustice for decades into the future.
8 The prospect of repowering has shocked Sierra
9 Club members, who live near gas-fired power
10 plants and breathe polluted air. Contrary to
11 what IEP has just stated, there is no
12 guarantee that efficiency upgrades or other
13 increases to gas capacity would not lead to
14 more harmful emissions. Repowering will also
15 deepen California's dependence on fuels --
16 fossil fuels at the very time when we need
17 the Commission to lead us towards clean
18 resources to meet our climate requirements in
19 2030 and beyond.

20 The Joint Agency SB 100 report
21 released just days ago and co-authored by
22 this very Commission confirms that we can
23 keep the lights on without any new gas.

24 Aside from these harms, the
25 decision is also illegal because the
26 Commission cannot make such a sweeping
27 authorization without any record support.
28 The Court of Appeals made this clear in TURN

1 versus PUC, where it annulled the
2 Commission's authorization of the Oakley
3 Power Plant because it lacked sufficient
4 evidence of need. The same flaw exists here.

5 There is no study that says we need
6 new gas. Indeed, no party to this proceeding
7 has even asking for repowering. What is
8 more, further reliance on gas plants is
9 completely misguided from a reliability
10 perspective, as the record shows the gas
11 plants failed this last August with numerous
12 forced outages. Repowering, which takes many
13 years far beyond 2021 or 2022, is outside the
14 scope of this proceeding and in direct odds
15 with the IRP proceeding, which has put the
16 issues squarely before the parties, many of
17 whom are not present here today. The proper
18 place for any long-term procurement planning
19 is the IRP and not this proceeding.

20 The rogue and reckless
21 decision-making embodied in the PD will harm
22 communities and exacerbate extreme weather
23 that brought us here.

24 The Commission must correct course
25 immediately and strike the PD's authorization
26 of any and all repowering.

27 ALJ STEVENS: Thank you.

28 MS. ROBERTSON: Thank you.

1 ALJ STEVENS: Moving on, we will turn
2 to the Center for Energy Efficiency and
3 Renewable Technologies represented by V.
4 John White, with two minutes. Are you
5 available?

6 ARGUMENT OF MR. WHITE

7 I am. Thank you very much for,
8 again, the opportunity to speak.

9 I wanted to reflect on the lack of
10 balance in this decision in terms of the
11 overriding emphasis on what I would say
12 doubling down on more gas, even though the
13 root cause analysis showed that there was a
14 significant part of the outage from the gas
15 plants because they don't perform well under
16 extreme heat conditions.

17 The other part that is important is
18 there seems to be a contradiction in terms of
19 the willingness to pay and experiment and see
20 what works with innovative Demand Response
21 opportunities, even though load flexibility
22 and Demand Response are zero pollution and
23 very-much enhancing of reliability.

24 On the one hand, not wanting to pay
25 these folks, but at the same time paying more
26 money to the very same gas specter that
27 didn't perform nearly as well as needed. And
28 the consequences of this are significant rate

1 impacts resulting from the automatic
2 pass-through of gas costs. And second, as
3 has been noted by the Sierra Club and others,
4 continued pollution in the disadvantaged
5 communities of California, despite promises
6 over the years to retire these old gas plants
7 that have significant amount of consumption
8 that they provide in terms of the gas demand.

9 And so we need more balance in the
10 proposal which is why I think there is so
11 much concern being expressed today about the
12 things that are missing, as well as the
13 over-reliance on natural gas. Thank you.

14 ALJ STEVENS: Thank you. Moving on to
15 The Utility Uniform Network with Michael
16 Florio with two minutes. Michael, are you on
17 the line?

18 MR. FLORIO: Yes. Can you hear me?

19 ALJ STEVENS: Yes, I can. Please go
20 ahead.

21 ARGUMENT OF MR. FLORIO

22 Thank you. I wanted to compliment
23 the Proposed Decision's treatment of the
24 planning reserve margin by increasing it, in
25 effect, but not formally. It's a very
26 elegant approach. It does need some
27 clarification and I would refer to the
28 comments of Edison and PG&E of where those

1 clarifications are needed.

2 But the reality is we are not going
3 to get very much new supply in the limited
4 time that we have. I think it's particularly
5 important that the Commission revitalize its
6 Demand Response Programs. That further
7 argument for keeping this proceeding open,
8 among other things, we really need to take a
9 hard look at how Demand Response is measured.
10 The current baselines do not work in extreme
11 heat conditions. TURN attached to its
12 comments a graphic presented by Southern
13 California Edison that illustrates very
14 vividly why the current baselines do not work
15 during hot weather. There are new methods
16 out there that are being developed to measure
17 Demand Response and the Commission needs to
18 look into those very seriously rather than
19 continuing to rely on methodologies that were
20 developed over a decade ago before modern
21 computing power and data analytics were
22 available. There are much better ways to do
23 this.

24 I think if you do a careful
25 forensic look at what happened in the summer
26 of 2020, you will see that Demand Response
27 actually performed better than expected, not
28 worse as indicated in the root cause

1 analysis. Thank you.]

2 ALJ STEVENS: My apologies. At the
3 moment, we will move on to the California
4 Independent System Operator represented by
5 Jordan Pinjuv. Are you on the line?

6 MR. PINJUV: I'm on the line. Can you
7 hear me?

8 ALJ STEVENS: Yes, I can. Go ahead.

9 ARGUMENT OF MR. PINJUV

10	Great. Thanks.
----	----------------

11 The ISO supports the effective 17.5
12 percent PRM for 2021, and in particular, the
13 ISO appreciates the direction of the PD that
14 incremental resources be available during the
15 net demand peak period.

On the need for increased capacity for summer 2021, I want to highlight the ISO's analysis shows that the available RA resources during that net demand peak period will be significantly below 15 percent reserve margin based if requirements continue to be set based on the gross peak.

Based on the current capacity counting rules, we'll be planning the system to procure RA resources that have a reserve margin between 14 and down to even 3 percent at the net demand peak period just based on the suite of resources that we expect.

1 So the CAISO encourages the
2 Commission to adopt the Proposed Decision's
3 incremental capacity procurement and to
4 continue to move toward adopting RA
5 requirements that are designed to meet the
6 net demand peak period and provide adequate
7 reserves as well. And that concludes my
8 comments.

9 ALJ STEVENS: Thank you.

10 Moving on, we have the Green Power
11 Institute in combination with the California
12 Biomass Energy Alliance represented by Gregg
13 Morris with four minutes. Gregg, are you on
14 the line?

15 MR. MORRIS: Yes. Thank you, your
16 Honor.

17 ALJ STEVENS: Go ahead.

18 ARGUMENT OF MR. MORRIS

19 We actually joined with the UCS in
20 being very concerned about raising the PRM in
21 this proceeding. The PRM is really a matter
22 for being set in the RA proceeding.
23 Currently, the IRP proceeding is also
24 adjusting the PRM, and they're trying to
25 raise it to 20.7 percent.

26 It's really the demand forecast in
27 our opinion, not the PRM, that ought to be
28 raised if we're looking to increase the

1 amount of power on the grid. So I wanted to
2 put that in there, and also say that this is
3 a matter, and so is short-term procurement
4 that ought to be well-coordinated with the
5 IRP because the IRP is currently doing
6 procurement in the medium term, and some of
7 these opportunities are available in the
8 short term and then feed into the longer
9 term.

10 On behalf of the California Biomass
11 Association, as well as Green Power
12 Institute, we're concerned -- although it has
13 not come up today, we're concerned that there
14 are parties in this proceeding that have
15 tried to cut off all Biomass procurement.

16 Biomass actually provides, and there
17 are already negotiations as a result of the
18 first Decision in this proceeding, some
19 excellent capacity-only opportunities for
20 Biomass plants that are actually under --
21 that have contracts that are well-below their
22 generating capacity, and they are quite
23 capable of providing surplus capacity as
24 needed, and only as needed. So this is an
25 ideal resource.

26 We also have Biomass plants that are
27 either about to shut down because their
28 contracts are expiring or that are already

1 shut down, but only recently, and could
2 easily restart. And, again, those kind of
3 opportunities need a longer-term contract in
4 order to make them happen, and that's another
5 place where we need to coordinate with the
6 IRP.

7 Finally, we're big proponents of the
8 ReMAT program, and ReMAT facilities when
9 they're hybrids, when they're paired with
10 batteries, are quite capable of giving
11 reliable power, but hybrids are not currently
12 eligible for the ReMAT program. So there's a
13 place for coordination of this proceeding
14 with the -- that's in this case -- the RPS
15 proceeding to get those things put into the
16 mix.

17 So I think we'd love to keep this
18 open and have those sort of near, but also
19 immediate-term opportunities to be pushed in
20 their respective proceedings. So thank you
21 very much for the opportunity.

22 ALJ STEVENS: Thank you.

23 Moving on, next we have Southern
24 California Edison with two minutes
25 represented by Katie Sloan. Katie, are you
26 on the line?

27 MS. SLOAN: Yes, I am here.

28 ALJ STEVENS: Go ahead.

ARGUMENT OF MS. SLOAN

Thank you, again, for your time.

SCE supports the Commission's efforts to shore up system reliability through incremental procurement, including the Proposed Decision's proposal to enhance reliability for summer 2021 and 2022 using Investor Owned Utility Cost Allocation Mechanism, CAM, procurement based on an effective 17.5 percent planning reserve margin.

SCE agrees that IOUs are best positioned to conduct this procurement and SCE will use its best efforts to meet the target. It may be challenging to do so in certain months, like August and September, due to the tightness of the market and the short time before this summer.

SCE is willing to take on this responsibility for all customer; however, the Commission should clarify the ISOs are not subject to increased Resource Adequacy requirements, other compliance obligations, or potential penalties if they cannot meet these additional targets despite their best efforts.

Simultaneously, the IOUs will be purchasing to meet the procurement targets in

1 the Proposed Decision and also to meet their
2 own Resource Adequacy requirements on behalf
3 of bundled customers. The IOUS must be able
4 to procure first to meet bundled customer
5 needs before satisfying the procurement
6 target in this Proposed Decision.

7 All other Load Serving Entities will
8 be able to procure to meet their own Resource
9 Adequacy requirements, and IOU bundled
10 customers should not be disadvantaged because
11 the IOUs are also required to purchase
12 additional resources on behalf of all
13 benefiting customers.

14 After meeting the Resource Adequacy
15 requirement for bundled customers, however,
16 the IOUs may have Resource Adequacy long
17 positions that would provide a simple,
18 viable, and cost-effective method for meeting
19 part of the procurement targets in the
20 Proposed Decision; therefore, the
21 Commission --

22 (Alarm sounds.)

23 MS. SLOAN: -- should authorize the
24 IOUs to allocate any excess system RA in
25 their monthly RA showings toward the
26 procurement targets with compensation for
27 bundled customers at the PCIA's benchmark.
28 Thank you.

1 ALJ STEVENS: Thank you.

2 Finally, we have the California
3 Energy Storage Alliance represented by Jin
4 Noh. Jin, are you available?

5 MR. NOH: Thank you, your Honor.

6 ALJ STEVENS: Go ahead.

7 ARGUMENT OF MR. NOH

8 CESA is generally supportive of the
9 timing, analysis, and amount of the
10 procurement order for summer 2021 and 2022.
11 In particular, we're strongly supportive of
12 the focus on summer 2022 needs as well, which
13 is necessary to enable a broader range of
14 solutions that can provide incremental
15 capacity such as energy storage, preferred,
16 and demand-side resources. Without a timely
17 order for summer 2022, we'll be faced with
18 the same landscape present today, where we
19 have a very limited range of solutions to
20 address emergency reliability risks and
21 needs.

22 Several parties took issue with the
23 procurement authorization and order without
24 sufficient needs, analysis, and evidence. In
25 any other circumstance, we agree where we
26 have the luxury of time to conduct such
27 analysis.

28 However, for energy storage

1 resources to be viable by next summer, a
2 timely procurement order is needed with a
3 final decision by March 25, 2021 as planned.
4 And with appropriate procurement parameters,
5 we believe that many of the concerns of
6 resulting outcomes could be addressed with
7 guardrails to mitigate against long-term
8 reliance on fossil generation.

9 We also add that procurement
10 parameters be set for incremental capacity to
11 have commercial online dates by September 1,
12 2022 or earlier, and to allow pre-RA
13 deliveries for resources on the path to
14 deliverability, which generally aligns with
15 the ISO's analysis of time of need and
16 accounts for lead times that new storage
17 capacity is needed to come online.

18 Thank you.

19 ALJ STEVENS: Thank you.

20 That concludes the parties that
21 timely requested to join this section.

22 We have three remaining parties that
23 requested participation after the timeline
24 set in initial ruling; so those parties may
25 speak to any issues have been addressed here
26 today. We will begin with the California
27 Large Energy Consumer Association represented
28 by Nora Sheriff. Nora, are you on the line?

1 MS. SHERIFF: Yes. Thank you.

2 ALJ STEVENS: Go ahead.

3 ARGUMENT OF MS. SHERIFF

4 Judge Stevens, and Commissioners,
5 this is Nora Sheriff for CLECA, the
6 California Large Energy Consumers
7 Association, and thank you for this
8 opportunity to speak. I will focus on BIP
9 and the ELRP.

10 BIP has worked to meet the grid's
11 needs since the 1980s. Many of CLECA members
12 have participated in BIP since then. All
13 CLECA members participate in BIP now, and
14 CLECA's aggregate annual demand is a bit over
15 560 megawatts, much of that is in BIP.

16 CLECA supports the approval of the
17 BIP incentive increases. SCE demonstrated
18 its customer attrition in the November
19 opt-out window, and PG&E also lost
20 participants.

21 CLECA members experienced customer
22 fatigue directly in 2020. To incent
23 participation, you need incentive levels that
24 make sense for the participants. Given the
25 number of events called last year and the
26 expectation of continued reliability
27 challenges, the BIP incentive levels,
28 particularly for SCE, do need to increase.

1 You should not decrease penalties to address
2 customer fatigue and attrition. Penalties
3 drive performance, not participation.
4 Incentives drive participation. I'm happy to
5 answer questions on this.

6 CLECA also supports SCE's request
7 for funding to study the differences between
8 the Load Impact Protocols and the baselines
9 used by the CAISO in settlement for DR. The
10 amount of RA value provided by DR during
11 August and September has been the subject of
12 much dispute. More clarity on the
13 differences is critical and could be provided
14 by the study.

15 It should be clearer that all BIP
16 participants may dual participate in the
17 ELRP. For standalone ELRP events, BIP
18 participant load sheds should be compensated
19 just like all others, regardless of firm
20 service level. If events overlap, provide
21 ELRP compensation for the BIP load shed
22 beyond the firm service level.

23 And, finally, please adopt and
24 implement a full scale ELRP informed by what
25 can be done by the utilities. Thank you.
26 And, again, I'm happy to answer any
27 questions.

28 ALJ STEVENS: Thank you.

1 Next, we have Protect Our
2 Communities represented Bill Powers.

3 Bill, are you available?

4 MR. POWERS: I am, your Honor.

5 ALJ STEVENS: Thank you. Please, go
6 ahead.

7 ARGUMENT OF MR. POWERS

8 Bill Powers, Protect Our Community
9 Foundation. The Commission must prevent the
10 rollback authorized in the PD of current
11 environmental, environmental justice, and
12 consumer protections. Ratepayers should not
13 be required to pay for any PUC-ordered
14 program or incentive that allows the use of
15 prohibited fuel sources or additional
16 fossil-fueled electricity. The Commission
17 should not allow additional fossil-fueled
18 procurement contracts.

19 The Commission should reject the
20 PD's canceling of current cost-effectiveness
21 requirements for the various DR Programs
22 approved and expanded in the PD.

23 As my testimony and other PCF expert
24 testimony details, plant outages and
25 excessive exports caused the blackouts last
26 August. The ISO acknowledges plant outages
27 as a problem. The PD relies on plant outages
28 to --

1 (Unmuted phone-line noise.)

2 ALJ STEVENS: Off the record.

3 MR. POWERS: -- expand DR Programs,
4 increase the Planning Reserve Margin, and
5 allow additional procurement, without ever
6 addressing PCF's testimony on plant outages
7 and exports. In fact, the PD violates --

8 ALJ STEVENS: Hold on one second.

9 MR. POWERS: -- due process and basic
10 administrative agency law by failing to even
11 mention PCF, much less address its evidence.

12 ALJ STEVENS: Mr. Powers --

13 MR. POWERS: PCF requested evidentiary
14 hearings to address the material disputes in
15 this ratesetting proceeding and was refused.

16 The record in this proceeding does
17 not support increasing the PRM to 17.5
18 percent, much less to higher levels.

19 The PD's increase of the PRM past
20 2021 and continuing until and unless the
21 Commission changes it violates California law
22 because it exceeds the scope of this
23 proceeding.

24 The Commission should investigate
25 the plant outages that occurred in August
26 2020, pursuant to PU Code Section 761.3 and
27 G.O. 167. Only by stopping exports and
28 reducing plant outages can the Commission

1 ensure reliability for next summer. The
2 Commission should reject this hasty and
3 mistaken PD and should resolve all
4 procurement, RA, and DR issues in their
5 respective ongoing proceedings. Thank you.

6 ALJ STEVENS: Thank you.

7 Off the record.

8 (Off the record.)

9 ALJ STEVENS: On the record.

10 While we were off the record, we
11 discussed the period of time where we went
12 off the record during Mr. Power's discussion
13 due to some somebody that yelled in the
14 background. So I'm going to issue a ruling
15 this afternoon that will allow Mr. Power to
16 supplement the record with his full comments.

17 At this time, we're going to move on
18 to the California Environmental Justice
19 Alliance represented Shana Lazerow.

20 Shana, are you available?

21 MS. LAZEROW: I am. Thank you.

22 ALJ STEVENS: Thank you. Go ahead.

23 ARGUMENT OF MS. LAZEROW

24 Good morning.

25 The horrific events in Georgia this
26 week are the extreme symptom of the racism
27 and disregard our society shows people of
28 color. We have the opportunity to take a

1 step to dismantle race-based, land-use
2 decisions that continue to kill communities
3 of color. Yes, reliability is vital to
4 environmental justice communities, but this
5 Proposed Decision does not get us there.

6 Instead it ignores opportunities to
7 bring in residential customers to help manage
8 load. Our members want to be part of the
9 solution. Instead this Proposed Decision
10 allows the repowering of gas-fired power
11 plants.

12 Plants that communities have worked
13 for decades to shut; for example, the
14 Etiwanda plant, which was one of the most
15 polluting plants and harmed generations of
16 community members could be repowered. Of
17 course, that would not be possible for 2021
18 and is outside the scope of any emergency
19 this proceeding has scoped to consider, but
20 the PD authorizes it anyway.

21 It also threatens our communities by
22 allowing diesel BUGs. Our communities
23 already face a health crisis from air
24 pollution. Paying BUGs to pollute our lungs
25 during extreme heat is a violation of the
26 public's trust.

27 We need reliability for summer 2021.
28 That means engaging residential Demand

1 Response, getting ourselves off gas-fired
2 power plants that underperform in high heat
3 and committing to resources that meet our
4 future and do not repeat the racist
5 decision-making of the past.

6 I'm cutting my comments short and I
7 ask you that we take my remaining time in
8 silent respect of the victims of the shooting
9 in Atlanta.

10 (Pause in proceedings.)

11 ALJ STEVENS: Thank you.

12 That concludes the parties'
13 presentation section of the Oral Argument.
14 There was a lot of information there. I
15 sincerely thank you all for the
16 participation. I do apologize, Mr. Powers,
17 about the interruption, but we will ensure to
18 get your full information on the record.

19 Now, we have a little time left,
20 about 15 minutes, for questions from
21 Commissioners. I'm going to try to inject
22 some order into this. So I will run through
23 the list of Commissioners; however, I want to
24 ensure that every Commissioner is able to ask
25 a question if they have any.

26 Let's start with the assigned
27 Commissioners. President Batjer, were there
28 any questions you had of the parties?

1 PRESIDENT BATJER: I would prefer to
2 allow my fellow Commissioners to go first. I
3 want to show deference to them. So, please,
4 I would give my time at this point, and then
5 at the end if I have any follow-up questions.
6 Thank you.]

7 ALJ STEVENS: Thank you. Let's move on
8 to Commissioner Houck. Did you have any
9 questions that you would like to pose to
10 parties?

11 COMMISSIONER HOUCK: Yes. Thank you,
12 Judge Stevens.

13 So I have a question to the DR
14 Parties regarding how we should be thinking
15 about DR performance metrics and the future,
16 where we expect more frequent extreme weather
17 events.

18 So a critical metrics in DR Programs
19 is approximating what a customer's load would
20 have been, absent the DR events. And this
21 involves using historical data, and this
22 becomes challenging during extreme weather
23 events, as I think one of the parties
24 mentioned.

25 So if the wrong baseline is being
26 used, DR resources can seem as though they're
27 underperforming, which may misrepresent the
28 reality. Can the DR Coalition, the Joint DR

1 Parties or TURN provide more information
2 about what other metrics there may be for
3 measuring DR performance, such as day-of
4 adjustments and the policy trade-offs with
5 the current cap?

6 MR. WIKLER: Commissioner Houck, this
7 is Greg Wikler from the California Efficiency
8 Demand Management Council.

9 I will briefly speak to it, but it
10 is a -- it's a very deep topic. It would
11 take a long time to uncover a lot of the
12 details. But I will just say that we have
13 been in conversations with the California
14 ISO, as well as the Commission staff on
15 looking at alternative baseline methodologies
16 of using the power of data. I think one of
17 the other speakers had mentioned the power of
18 lots of -- lots of data and analytics that
19 are available to us that weren't available
20 when the DR load impact protocols were
21 initially developed over a decade ago.

22 So we are working very actively with
23 our other stakeholder communities to address
24 this problem. We are very much aware of it
25 and we think there are pathways that can get
26 us to the right -- to more accurate answers.

27 ALJ STEVENS: Thank you. I'll move on
28 to Commissioner Guzman Aceves.

1 Commissioner, would you like to pose
2 any questions? I believe you're muted.

3 COMMISSIONER GUZMAN ACEVES: Yes.
4 Thank you, Judge Stevens.

5 Yes, the question is for CLECA. I
6 just couldn't hear and I appreciate your
7 response to the argument by the agricultural
8 community; that is, what I understood was
9 instead of increasing the incentive, decrease
10 the penalty and you argued against that. But
11 you also made a -- I couldn't understand if
12 you said particularly the need for increasing
13 the disincentive for -- is it SDG&E or SCE?

14 MS. SHERIFF: SCE, Commissioner. The
15 incentives for Southern California Edison
16 have been decreasing since 2018, which is
17 problematic.

18 I will also note that for Southern
19 California Edison, their BIP program is
20 commercial and industrial customers. They
21 have a separate reliability Demand Response
22 Program for the agricultural customers,
23 whereas for PG&E, their BIP tariff includes
24 agricultural customers who have a somewhat
25 different load shape.

26 So for high-load factor customers,
27 industrial customers that run 24/7,
28 7-days-a-week, 365-days-a-year, you know, for

1 them the level of incentive really does drive
2 their participation, and CLECA has always
3 been supportive of higher penalties because
4 those penalties drive performance and the BIP
5 has always performed very well.

6 That is why when we are looking at
7 this, we see a particular need for the
8 increased incentives for Southern California
9 Edison and we do not support reducing the
10 penalties as a way to address customer
11 fatigue or attrition because penalties focus
12 on performance, not participation, from the
13 industrial customer high-load-factor customer
14 perspective.

15 COMMISSIONER GUZMAN ACEVES: Thank you
16 very much.

17 And then one additional question for
18 the ISO. And this is in relation to the Flex
19 Alert. Is there a response to the Sierra
20 Club study that was stated and I assume was
21 submitted by them into the record? I believe
22 it's the Christiansen Study.

23 MR. PINJUV: Thank you, Commissioner.
24 We did not respond specifically to that
25 study. We have looked at the Flex Alert's
26 capability in the past in several proceedings
27 that have been in front of the Commission.

28 Based on our review, we have seen

1 impacts from the flex load that provide
2 significant megawatt quantities of load
3 reduction. It is a somewhat difficult
4 program to quantify the actual reduction that
5 results from it. But based on our experience
6 with the operators, they do see a significant
7 reduction from the program.

8 And we would also note that with the
9 proposed changes that we plan to, or that we
10 have been advocating for, with respect to the
11 types of advertising and outreach that should
12 occur, we believe that is a definite impact
13 where more customers should be able to get
14 messaging from the Flex Alert program and
15 should have a greater impact in the future.

16 COMMISSIONER GUZMAN ACEVES: Are those
17 proposed changes in the record?

18 MR. PINJUV: Yes, we did propose those
19 in the record.

20 COMMISSIONER GUZMAN ACEVES: Thank you.
21 That's all, Judge Stevens.

22 ALJ STEVENS: Thank you, Commissioner.

23 Commissioner Shiroma, do you have
24 any questions at the moment?

25 COMMISSIONER SHIROMA: Yes, and they
26 are related to Demand Response. And I see
27 that there are several parties that would
28 like to respond to Commissioner Houck. So I

1 am fine in deferring my time to those
2 responses.

3 ALJ STEVENS: Is there a particular
4 party you would like to hear from? It looks
5 like we have Ms. Sheriff from CLECA and also
6 the Joint DR Parties.

7 COMMISSIONER SHIROMA: Well, let's see.
8 Nora Sheriff chatted in first. So let's hear
9 from her.

10 ALJ STEVENS: Ms. Sheriff.

11 MS. SHERIFF: Thank you, Commissioner
12 Shiroma and thank you, Commissioner Houck,
13 for the question.

14 I just want to briefly reiterate
15 that we need to figure out how to count
16 Demand Response and measure Demand Response
17 performance. I think when you have a 1-in-70
18 weather event or a 1-in-30 weather event, it
19 is going to be very, very challenging to find
20 10 comparable days prior to this.

21 I know that the load impact
22 protocols are specifically vigorous and look
23 at customer-specific regressions and I think
24 there's a way to do this in a
25 scientifically-sound manner. But we have to
26 do this. We really do have to sharpen our
27 pencils on measurements of Demand Response
28 performance, because I firmly believe that

1 Demand Response performance was very low in
2 August and September.

3 So I would ask, again, that that be
4 studied, and studied soon. Thank you.

5 ALJ STEVENS: Commissioner, do you have
6 any follow-up questions?

7 COMMISSIONER SHIROMA: Actually, I do.
8 And maybe I'll revisit on -- again on Demand
9 Response and whether CEERT has done any kind
10 of analysis. And I apologize if you've
11 already submitted this into the record.
12 Insofar as offsetting the diesel-fired backup
13 generation with Demand Response, if it is in,
14 you know, like-type metric levels. And your
15 request to keep the record open on Demand
16 Response others have asked as well, including
17 former Commissioner Florio, is this the right
18 proceeding for that effort, for the Demand
19 Response prolonged efforts?

20 MR. WHITE: Thank you, Commissioner.

21 I can't say that we have studied the
22 diesel generator issue in terms of how it
23 could be avoided, other than by simply not
24 allowing it. I think that those resources
25 should be off the table, except in the
26 extremely-limited circumstances, where they
27 serve as emergency backup for critical
28 facilities such as hospitals and other things

1 like that. But to let them be routinely
2 deployed, under the circumstances, simply
3 makes no sense and ought to be off the table.

4 I think the key is, can we bring
5 Demand Response forward and bring it to life
6 and make it more of a meaningful source of
7 our resiliency in these circumstances.

8 The reason that we -- we don't just
9 want to keep the record open. This
10 proceeding, the Demand Response Proceeding is
11 proposed to be terminated. And what we want
12 is to have -- particularly because a number
13 of, as Commissioner Florio said, a number of
14 good ideas have been put forward that may not
15 be available for 2021 but they would be
16 available in 2020. But if we close the
17 proceeding, those options will be foreclosed.

18 COMMISSIONER SHIROMA: Thank you.

19 MR. FLORIO: There really isn't another
20 proceeding --

21 ALJ STEVENS: Mr. Florio, please only
22 speak if called on. I apologize.

23 Commissioner, do you have any
24 follow-up questions?

25 COMMISSIONER SHIROMA: Well, let's give
26 30 seconds to Mr. Florio. How's that? Is
27 that okay?

28 ALJ STEVENS: Thank you. Please go on,

1 Mr. Florio.

2 MR. FLORIO: Thank you, Commissioner.

3 There really isn't another
4 proceeding keyed up to provide any guidance
5 or any deep dive into these measurement
6 issues, and since there's already a strong
7 record on Demand Response here, we think that
8 keeping this proceeding open would give you
9 that venue that doesn't otherwise exist.

10 Thank you.

11 COMMISSIONER SHIROMA: Thank you. Back
12 to you, Judge.

13 ALJ STEVENS: Thank you. Commissioner
14 Rechtschaffen, do you have any questions that
15 you would like to pose to parties?

16 COMMISSIONER RECHTSCHAFFEN: Thank you,
17 Judge.

18 Can I ask Edison and PG&E this
19 question: Have you started -- have you
20 looked at what the IT requirements would be
21 if you were to implement the equity ELRP
22 Pilot Program that CEJA and other parties
23 have proposed?

24 MS. SLOAN: Hi. This is Katie Sloan
25 from Southern California Edison. Would you
26 like me to respond, Judge?

27 ALJ STEVENS: Please, yes, go ahead.

28 MS. SLOAN: We have not specifically

1 looked at the IT requirements of the equity
2 programs. What we have done is we have
3 looked at the IT requirements associated with
4 the Proposed Decision and our comments
5 address what is and is not achievable by the
6 summer of 2021.

7 ALJ STEVENS: Commissioner.

8 COMMISSIONER RECHTSCHAFFEN: Judge,
9 could you ask PG&E to respond as well?

10 MS. ARNOUD: Yes. This is Fabienne
11 Arnoud for PG&E.

12 Similar to SCE, we haven't
13 specifically looked at the IT requirements
14 for the Equity ERP Program. We're also
15 hearing, you know, the need to get megawatts
16 enrolled as early in the summer as possible
17 in this program. So we have been working
18 with a program implementer to start setting
19 up the program but not specifically for the
20 Equity ELRP Program proposal.

21 COMMISSIONER GUZMAN ACEVES:
22 Commissioner Rechtschaffen, can I ask a
23 follow-up on your question?

24 COMMISSIONER RECHTSCHAFFEN: Yes,
25 please go ahead.

26 COMMISSIONER GUZMAN ACEVES: Yeah,
27 particularly of PG&E. PG&E described a
28 residential program. Is this not something

1 that could be combined with that effort? And
2 if PG&E as well as CEJA would like to respond
3 to the feasibility of that, that would be
4 great.

5 ALJ STEVENS: Please go ahead.

6 MS. ARNOUD: This is Fabienne Arnoud
7 for PG&E.

8 Yes, you are right that the
9 residential reward is also addressing the
10 residential customer segment. And we are
11 also working in collaboration with our
12 low-income programs to also try to target
13 customers that have been receiving a Smart
14 Thermostat under those programs. So we are
15 trying to address those equity issues through
16 the design of the residential rewards pilot.

17 ALJ STEVENS: Thank you. Commissioner
18 Guzman Aceves, any follow-up questions on
19 that?

20 COMMISSIONER GUZMAN ACEVES: I just
21 wonder if Shana from CEJA had any response to
22 the opportunity there.

23 MS. LAZEROW: Absolutely. Thank you,
24 Commissioner.

25 And from CEJA's perspective, we
26 would be eager to work with the utilities on
27 this. We designed it to be a very
28 straightforward program. We believe it could

1 be implemented as the pilot this summer and
2 growing for summer 2022. The Baltimore
3 program on which it was based delivered a
4 300-megawatt performance and so we are not
5 talking about an incidental addition to grid
6 reliability. This is a serious program that
7 we put significant effort into design of that
8 we believe is extremely feasible.

9 ALJ STEVENS: Thank you. With that,
10 we're going to conclude the open Question and
11 Answer period. I will allow the assigned
12 Commissioner a final thought, if she has any
13 final notes that she would like to make.

14 PRESIDENT BATJER: Sorry. I was on
15 mute. I was going to ask a couple of
16 questions. Do we still have time, Judge?

17 ALJ STEVENS: Yes. We may lead the
18 hearing. Yes. You may lead the hearing. Go
19 ahead.

20 PRESIDENT BATJER: Okay. I deferred my
21 time to my fellow commissioners to make sure
22 they got their questions in.

23 So one question to PG&E is what
24 percent of their proposed residential rewards
25 budget would go to the third-party
26 implementers versus toward incentives? If I
27 could ask PG&E that, Judge.

28 ALJ STEVENS: Please go ahead.

1 MS. ARNOUD: This is Fabienne Arnoud
2 for PG&E.

3 The current design of the
4 residential rewards pilot is, again, trying
5 to get megawatts as early as possible this
6 summer. And so with the initial design,
7 we're not -- we're going to go with direct
8 enrollment with PG&E and could consider later
9 on how to include aggregators also in the
10 design to grow the residential rewards pilot.
11 And, again, I want to underscore that this is
12 a proposal very similar to what has been
13 approved for SCE and SDG&E and their
14 proposals don't include aggregators either at
15 that stage of the pilot's development.

16 PRESIDENT BATJER: Okay. So I know,
17 Edison, you talked about your billing issues.
18 Was the cost of manual billing customers for
19 -- you're concerned about that, you talked
20 about the struggles you're having obviously,
21 but the customers for -- what was the annual
22 billing, not annual, excuse me, the
23 additional manual billing costs for customers
24 to be added weekends and holidays if the cost
25 is based on a present situation, and I am
26 thinking kind of like Labor Day, for example.
27 So they were to call two events on a weekend,
28 would their projected costs double?

1 MS. SLOAN: So, if the Commission -- is
2 it okay to speak? Sorry.

3 ALJ STEVENS: Go ahead, Southern
4 California.

5 MS. SLOAN: So if the Commission
6 requires SCE to include weekends and holidays
7 as potential call days for critical peak
8 pricing this summer, regardless of whether an
9 event is called or not, we estimate that, no
10 matter what just to set it up, there will be
11 \$5.5 million of fixed costs associated with
12 that. This is a rough estimate. We have
13 been trying to determine the cost of
14 developing the processes, calculation tools,
15 tracking databases, hiring and training
16 resources, because there's, you know, quite a
17 few bills that we would have to do manually.
18 We have not estimated, after the fixed cost,
19 a per-event number as you specifically asked,
20 but the fixed costs associated with these
21 changes we're estimating to be about 5.5
22 million.

23 PRESIDENT BATJER: Okay. Judge, I have
24 one final kind of thought in terms of a
25 question I would like to ask. I don't know
26 of whom I can really ask this. But, you
27 know, there's been as we have all seen a lot
28 of marketing of personal generators for

1 homes. The market has been flooded,
2 particularly since last -- my -- my viewing
3 time has been flooded with these kinds of
4 offerings to customers and they're expensive,
5 but people are buying them.

6 When the grid -- when the generators
7 go down, when the grid goes off, when the
8 grid goes down, those generators, those
9 personal residential generators, they're
10 firing them up and this is often true in
11 those areas where again these are through
12 people who can actually afford them, but in
13 the high-fire Tier 3 and Tier 2 areas.

14 So it's a concern because we lose
15 the grid and we have generators everywhere
16 that are going to be fired up for residential
17 and personal use. Sort of a concern I have.
18 I don't know how we get our arms around it
19 other than keeping the grid strong and on.

20 And there is concern on both sides
21 of this equation. There's no doubt.

22 My thought is just generally thank
23 you all very much. This has been a very
24 helpful and healthy and helpful dialog. Lots
25 of good questions and rich comments. This
26 has been expedited. There is a worry that I
27 have that, to use fellow and former
28 Commissioner Florio's comments, that there's

1 a lot of good testimony that has been left on
2 the drawing room floor. And I am certainly
3 taking those comments under serious
4 consideration. And I share many people's
5 concerns that they voiced today. I am also
6 very concerned about the impact to the
7 medical baseline, the critical needs, the
8 critical facilities and the economy of
9 California when the lights go down, whether
10 its for six hours or 36 hours.

11 We're the 5th largest economy in the
12 world and as Governor Newsom said, "We should
13 be able to keep the lights on."

14 So I really thank you all for
15 participating today and the staff of the
16 Energy Division and each of the
17 Commissioners' staffs have worked extremely
18 hard on this expedited OIR.

19 Former Commissioner Liane Randolph
20 was wise and thoughtful and visionary to
21 launch this before she departed in November.
22 I miss her every day. I particularly missed
23 her today.

24 Judge, back to you.]

25 ALJ STEVENS: Thank you, President
26 Batjer.

27 At the moment that concludes the
28 Oral Argument. I sincerely thank everybody

1 for their participation. I look forward to
2 reading your reply comments that will come in
3 today, and we'll adjourn. Off the record.
4 Thank you.]

5 (Whereupon, at the hour of 11:09
6 a.m., the Commission then adjourned.)

7 * * * * *

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

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CAROL ANN MENDEZ
CSR NO. 4330

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