



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

Application of Pacific Gas and Electric Company (U 39 E) for Approval of its Demand Response Programs, Pilots and Budgets for Program Years 2023-2027

Application 22-05-002
(Filed May 2, 2022)

FILED

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Application of San Diego Gas & Electric Company (U 902 E) Requesting Approval and Funding of its Demand Response Portfolio for Bridge Year 2023 and Program Years 2024-2027.

Application 22-05-003
(Filed May 2, 2022)

Application of Southern California Edison Company (U 338-E) for Approval of Demand Response Programs and Budgets for 2023-2027.

Application 22-05-004
(Filed May 2, 2022)

**RESPONSE OF
CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES
TO APPLICATIONS OF PACIFIC GAS AND ELECTRIC COMPANY, SAN DIEGO
GAS & ELECTRIC COMPANY, AND SOUTHERN CALIFORNIA EDISON COMPANY
FOR APPROVAL OF THEIR DEMAND RESPONSE PROGRAMS**

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For: CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES

June 6, 2022

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OF THE STATE OF CALIFORNIA**

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**RESPONSE OF
CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES
TO APPLICATIONS OF PACIFIC GAS AND ELECTRIC COMPANY, SAN DIEGO
GAS & ELECTRIC COMPANY, AND SOUTHERN CALIFORNIA EDISON COMPANY
FOR APPROVAL OF THEIR DEMAND RESPONSE PROGRAMS**

Center for Energy Efficiency and Renewable Technologies (CEERT) respectfully files this Response to Application (A.) 22-05-002, et al. which are the Applications of Pacific Gas and Electric Company’s (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Edison Company (SCE) for approval of their Demand Response (DR) Programs.

On May 25, 2022, Administrative Law Judges (ALJs) Lakhanpal and Toy issued a Ruling Consolidating Proceedings and Setting a Prehearing Conference (ALJ Ruling). This Response is timely filed and served pursuant to Rule 2.6 of the Commission’s Rules of Practice and Procedure and the instructions in the ALJ Ruling.

**I.
BACKGROUND**

CEERT is a nonprofit public-benefit organization founded in 1990 and based in Sacramento. CEERT is a partnership of major private-sector clean energy companies,

environmental organizations, public health groups and environmental justice organizations. CEERT develops, advances, supports, and advocates for policies and decisions that promote global warming solutions and increased reliance on clean, renewable energy sources for California and the West. CEERT has been a long-time, active party in multiple proceedings before the Commission to advance those interests since its founding in 1990.

CEERT has been a party to numerous Commission proceedings relevant to these Applications, including but not limited to the DR rulemaking (R.13-09-011), Resource Adequacy (RA) rulemakings (R.17-09-020, R.19-11-009, and R.21-10-002), and the Extreme Weather rulemaking (R.20-11-003).

II. RESPONSE TO APPLICATION AND ISSUES TO BE CONSIDERED

Pursuant to Rule 2.6(c), CEERT offers this response to identify certain concerns and issues that should be addressed and resolved in a Commission decision on the Applications. CEERT's primary interest in this proceeding is to ensure that any resulting decisions will be based on policies and programs that recognize the value of, and the need for increased reliance on, DR to meet California's clean energy needs. The Commission must promote DR to fully capitalize on the benefits DR brings to the grid.

CEERT has long supported DR and urges the Commission to provide the same level of attention and urgency associated with DR resources as it does to other resources. CEERT seeks to ensure that DR is promoted effectively in California. CEERT has concerns that in the past the Commission has overlooked or ignored recommendations made by DR parties which would have advanced this important resource. CEERT seeks to ensure that the same does not occur in this proceeding.

It is CEERT's position that the Commission must give full consideration to proposals and responses to investor-owned utility (IOU) IOU DR programs provided by DR providers and DR advocates in order to further advance DR. DR providers have had long experience in providing load reduction resources in California. As such, DR providers and DR advocates are in the best position to provide information about what will and will not work to grow much needed DR and load flexibility in this state. When the Commission issues a decision in this proceeding it should take into account and provide significant weight to any recommendations provided by DR providers and DR advocates which modify these Applications.

**III.
PROPOSED CATEGORY FOR APPLICATION, NEED FOR EVIDENTIARY
HEARING, AND PROPOSED SCHEDULE**

CEERT does not object to the IOUs' determination that these proceedings be categorized as ratesetting. CEERT does not take a position on the need for hearing and schedule, but reserves the right to comment on the need for hearing and schedule at a later time.

**IV.
CONFIRMATION OF PARTY STATUS**

Commission Rules of Practice and Procedure, Rule 1.4(a)(2)(i) provides that "a person may become a party to a proceeding" by filing "a protest or response to an application." As such, through the filing of this Response, CEERT requests that it be given party status in A.22-05-002, et al. (DR Programs) with the contact information below:

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***FOR: CENTER FOR ENERGY EFFICIENCY AND RENEWABLE
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Dated: June 6, 2022

Respectfully submitted,

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