

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



FILED

09/12/23
02:25 PM
A1811015

Application of Pacific Gas and Electric
Company for Approval of Its Proposals and
Cost Recovery for Improvements to the Click-
Through Authorization Process Pursuant to
Ordering Paragraph 29 of Resolution E-4868.
(U39E)

A.18-11-015

And Related Matters

A.18-11-016

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**REPLY COMMENTS OF OHMCONNECT, INC. ON PROPOSED DECISION
APPROVING CLICK-THROUGH ENHANCEMENT APPLICATIONS**

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September 12, 2023

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**REPLY COMMENTS OF OHMCONNECT, INC. ON PROPOSED DECISION
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Pursuant to Rule 14.3 of the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, OhmConnect, Inc. (“OhmConnect”) respectfully submits these reply comments on the *Proposed Decision Approving Click-Through Enhancement Applications* (“Proposed Decision”) issued on August 18, 2023, in the above-captioned proceeding.

I. CUSTOMERS SHOULD BE PROVIDED A ONE-CLICK DISENROLLMENT PROCESS

San Diego Gas & Electric Company (“SDG&E”) incorrectly asserts that the Proposed Decision’s direction to create an enrollment conflict resolution process as part of the click-through process (“CTP”) has no factual, legal or policy support and is out of scope of the proceeding.¹ The testimonies submitted during the proceeding demonstrate otherwise. Disenrollment as part of the CTP was specifically introduced in this proceeding as a proposal to improve the customer experience in the CTP.² In 2021, both Pacific Gas and Electric Company

¹ SDG&E Opening Comments at 2.

² Ex. OHM-601 (Prepared Testimony of OhmConnect) at 12: 3-4.

(“PG&E”) and Southern California Edison Company (“SCE”) acknowledged disenrollment as part of the CTP in their rebuttal testimonies.³ The Commission should reject SDG&E’s assertion and continue to focus on disenrollment as an important component of the customer experience in the CTP.

II. THE PROPOSED DISENROLLMENT PROCESS REQUIRES FURTHER STAKEHOLDER REFINEMENT TO CREATE A POSITIVE CUSTOMER EXPERIENCE

OhmConnect, Leap, and Mission:Data all support the Commission trying to ensure that customers are provided the option to disenroll from an IOU program during the CTP.⁴ The CTP is the primary opportunity to identify and resolve enrollment conflicts with the IOUs because the customer must complete the CTP to provide authorization to share their electricity usage data. During the CTP, the utility can authenticate an individual and determine the individual’s current enrollment. However, the specific disenrollment solution offered by the Proposed Decision requires further revision to create a positive customer experience.⁵

Various parties raise a number of legitimate issues that the Proposed Decision’s disenrollment solution does not contemplate. *First*, PG&E noted that the pop-up windows only notify the customer of IOU program conflicts and that if the customer enrolled with a third-party DRP, the pop-up window, as currently proposed, may mislead the customer to believe they can enroll in another program.⁶ *Second*, SCE correctly identified a potential issue for customers with multiple accounts, especially business customers with a large number of accounts, and suggested

³ Ex. PG&E-0002 (PG&E Rebuttal Testimony) at 2-15-2-19; Ex. SCE-0101 (SCE Rebuttal Testimony) at 20-21.

⁴ OhmConnect Opening Comments at 4, Leap Opening Comments at 3, Mission:Data Opening Comments at 10.

⁵ PG&E Opening Comments at 6.

⁶ *Id.* at 7.

that the Proposed Decision's solution should only apply to residential customers.⁷ Finally, both SCE and PG&E raised program specific incompatibility issues that may occur under the proposed solution. PG&E noted the incompatibility that may arise when there are conflicting enrollments in the Capacity Bidding Program (CBP) and Base Interruptible Program (BIP) as PG&E is unable to access enrollment dates.⁸ SCE proposed to exclude IOU third-party programs entirely (CBP, BIP for Aggregators, and Demand Response contracts) for similar reasons.⁹

Given these issues which the disenrollment solution should address, and, as PG&E correctly noted, (i) the limited time to consider necessary improvements offered through the comment process,¹⁰ (ii) the potential benefits of coordination across both the Demand Response Application (A.22-02-005, et al.) and Advanced Demand Flexibility (R.22-07-005) proceedings,¹¹ and (iii) the benefits of a flexible IT infrastructure to accommodate future needs,¹² the Commission should allow stakeholders to collectively work towards a revised solution for disenrollment. To ensure a timely solution is created, the Commission should make use of the Tier 2 advice letter that PG&E recommended¹³ and establish the following guiding principles and deadlines:

- Disenrollment must include an online process that can be accessed from the click-through flow;
- Confirmation of the final outcome selected by the customer must be shared with the third party DRP;

⁷ SCE Opening Comments at 5.

⁸ PG&E Opening Comments at 8.

⁹ SCE Opening Comments at 5.

¹⁰ PG&E Opening Comments at 6.

¹¹ *Id.* at 7-8.

¹² *Id.* at 9.

¹³ *Id.* at 6.

- The working group to determine a revised solution for disenrollment shall convene within 30 days of issuance of the final decision;
- The advice letter proposing a revised solution for disenrollment shall be filed within 120 days of issuance of the final decision; and
- Implementation of the solution by the utilities must occur within six months of the approval of the advice letter.

Establishing a working group to create a revised solution for disenrollment would be similar to the process used for the Demand Response Auction Mechanism (DRAM) in D.14-12-024.¹⁴ It also ensures that the eventual solution takes into account a wide range of issues, while still adhering to guiding principles that prioritize (i) an accessible online disenrollment process, (ii) communication of the customer's enrollment decision to the CTP originator, and (iii) a positive customer experience. Accordingly, the Commission should initiate a collaborative stakeholder process that will ensure timely implementation of a one-click disenrollment option and provide customers an easy way to resolve enrollment conflicts.

Respectfully submitted,

By: /s/ _____

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Dated: September 12, 2023

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¹⁴ D.14-12-024 at 85-86 (Ordering Paragraphs 5 and 6).