

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



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Order Instituting Rulemaking to Oversee the
Resource Adequacy Program, Consider Program
Reforms and Refinements, and Establish Forward
Resource Adequacy Procurement Obligations.

R.21-10-002

RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY
(U 338-E) ON THE CALIFORNIA LARGE ENERGY CONSUMERS ASSOCIATION'S
PETITION FOR MODIFICATION OF D.23-06-029

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Dated: **September 25, 2023**

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Pursuant to Rule 16.4(f) of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), Southern California Edison Company (SCE) respectfully submits this *Response on the California Large Energy Consumer Association's (CLECA) Petition for Modification (Petition) of D.23-06-029 (the Decision)* filed on August 24, 2023.

The Petition requests modification to the Decision for several reasons, including to avoid a decline in customer participation in the Reliability Demand Response Resource (RDRR) programs.¹ SCE shares the very valid concerns CLECA expressed in its Petition about harm to RDRR participating customers, the RDRR program, and potential loss of the environmental and system benefits the RDRR program provides. SCE therefore recommends that the Commission revisit its Decision on the RDRR dispatch and reinstate the framework to which customers participating in the RDRR program have relied upon as a condition of their participation and performance.

¹ Petition, pp. 13-14.

SCE's recommendation is based upon the serious policy and legal reasons SCE explained in its numerous filings in the above captioned proceeding.² Although SCE does not reiterate those arguments here, it does incorporate them by reference. SCE has yet to experience RDRR program attrition, but SCE expects customers are reevaluating their participation in the RDRR program. If a significant migration away from the program were to occur, SCE has no confidence that it will be able to convince those customers to rejoin the RDRR program. SCE therefore appreciates the Commission's continuing consideration of this important issue.

Respectfully submitted,

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² See, e.g., SCE Opening Comments on Energy Division and Other Parties' Implementation Track Phase 3 Proposals, pp. 9-12; SCE Reply Comments on Energy Division and Other Parties' Implementation Track Phase 3 Proposals, pp. 1, 9-10; SCE Opening Comments on Proposed Decision (PD), pp. 2-6; SCE Reply Comments on PD, pp. 2-4.