

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



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Order Instituting Rulemaking to Enhance  
Demand Response in California.

R.25-09-004

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S REPLY  
COMMENTS ON THE ORDER INSTITUTING RULEMAKING TO  
ENHANCE DEMAND RESPONSE IN CALIFORNIA**

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## SUMMARY OF RECOMMENDATIONS<sup>1</sup>

In response to Opening Comments to the OIR, CalCCA recommends that the Commission:

- Reject SCE’s proposal to consider dynamic rate data systems and processes only in dynamic rate applications to ensure needed updates are made to enable a level playing field for data access;
- Adopt 350 Bay Area’s recommendation to consider how deployment of DR resources can be incorporated into state energy planning processes, including the IEPR, IRP, and transmission planning, to ensure outcomes from this proceeding are actionable;
- Consider topics related to customer experience with DR programs and resources as recommended by Olivine, Vote Solar, PG&E, SDG&E, and SCE to address customer barriers to adoption;
- Adopt SCE’s recommendation to address rules to enhance and target load flexibility to harmonize the benefits and limitations of load flexibility, DR resources, and dynamic rates;
- Adopt PG&E’s recommendation to develop a flexible policy framework that enables virtual power plants to provide more grid services;
- Coordinate with the CAISO’s DDEMI and the Commission’s RA proceeding as recommended by several parties to align outcomes between the future of DR resources and California’s grid needs; and
- Adopt SCE’s recommendation to hold workshops to clarify Energy Division Staff’s Proposed DR Guiding Principles, given the high volume of parties recommending modifications.

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<sup>1</sup> Acronyms used herein are defined in the body of this document.

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The California Community Choice Association<sup>2</sup> (CalCCA) submits these reply comments pursuant to Rule 6.2 of the California Public Utilities Commission’s (Commission) Rules of Practice and Procedure,<sup>3</sup> in response to party Opening Comments on the *Order Instituting Rulemaking to Enhance Demand Response in California*<sup>4</sup> (OIR), issued September 20, 2025, and the directives therein.<sup>5</sup>

**I. INTRODUCTION**

The strong interest of stakeholders in this proceeding is demonstrated by the 35 sets of Opening Comments filed in response to the OIR. This level of engagement, representing many interests, reiterates the need for the Commission to craft the scope of this proceeding carefully, ensuring that parties have an adequate opportunity to discuss and review the broad range of

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<sup>2</sup> California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance of Southern California, CleanPowerSF, Desert Community Energy, Energy For Palmdale’s Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

<sup>3</sup> *State of California Public Utilities Commission, Rules of Practice and Procedure, California Code of Regulations Title 20, Division 1, Chapter 1* (May 2021).

<sup>4</sup> *Order Instituting Rulemaking to Enhance Demand Response in California*, Rulemaking (R.) 25-09-004 (issued Sept. 29, 2025).

<sup>5</sup> All references to Opening Comments refer to the Opening Comments on the OIR filed in this docket on November 13, 2025.

proposals. CalCCA continues to support its scoping recommendations set forth in its Opening Comments. These Reply Comments address the numerous additional scoping items recommended by parties, aiming to optimize the scope of this proceeding for improving demand response (DR) and load shifting resources.

As set forth below, CalCCA recommends that the Commission:

- Reject Southern California Edison Company's (SCE) proposal to consider dynamic rate data systems and processes only in dynamic rate applications to ensure needed updates are made to enable a level playing field for data access and to enable all load-serving entities to participate in dynamic pricing;
- Adopt 350 Bay Area's recommendation to consider how deployment of DR resources can be incorporated into state energy planning processes, including the California Energy Commission's (CEC) Integrated Energy Policy Report (IEPR), the Commission's Integrated Resource Planning (IRP) and Resource Adequacy (RA) proceedings, and the Commission's and the California Independent System Operator's (CAISO) transmission planning, to ensure outcomes from this proceeding are actionable;
- Consider issues regarding customer experience with DR programs and resources to address customer barriers to adoption as recommended by Olivine, Inc. (Olivine), Vote Solar, Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and SCE;
- Adopt SCE's recommendation to address rules to enable harmonizing the benefits and limitations of load flexibility, DR resources, and dynamic rates;
- Adopt PG&E's recommendation to develop a flexible policy framework that enables virtual power plants (VPP) to provide more grid services;
- Ensure coordination with CAISO's Demand and Distributed Energy Market Integration (DDEMI) initiative and the Commission's RA proceeding as recommended by several parties to align outcomes between the future of DR resources and California's grid needs; and
- Adopt SCE's recommendation to hold workshops to clarify Energy Division Staff's Proposed DR Guiding Principles, given the high volume of parties recommending modifications.

## **II. SCE’S PROPOSAL TO CONSIDER DYNAMIC RATE DATA SYSTEMS AND PROCESSES ONLY IN DYNAMIC RATE APPLICATIONS SHOULD BE REJECTED**

The Commission should reject SCE’s recommendation to only consider updates to investor-owned utility (IOU) dynamic rate systems and processes in individual IOU dynamic rate applications. SCE distinguishes statewide systems and processes from those related to individual IOU dynamic rate proposals, and recommends that this proceeding should only consider statewide systems rather than individual IOU systems to enable dynamic rates.<sup>6</sup> SCE states that it “is concerned that the implementation of dynamic rates will be delayed if the DR Rulemaking considers both the systems and processes necessary to implement dynamic proposals and the broader statewide [CEC Load Management Standards (LMS)]-related systems together.”<sup>7</sup> SCE’s recommendation to disconnect IOU and statewide dynamic pricing systems and processes should be rejected because of the need for the systems to interact with one another.

Ignoring the needed updates to dynamic rate-related data systems in this proceeding will directly impede the broader implementation of dynamic rates and the requirements in the CEC’s LMS for IOUs, large community choice aggregators (CCA), and large publicly owned utilities regarding rates and programs related to dynamic prices. As CalCCA outlined in its Opening Comments, Decision (D.) 25-08-049 closed the Demand Flexibility proceeding without addressing items scoped into that proceeding relating to systems and processes necessary to enable access to dynamic rates for both bundled *and unbundled* customers.<sup>8</sup> The Commission

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<sup>6</sup> See SCE Opening Comments, at 16 (recommending considering statewide data systems for dynamic rates in this proceeding and leaving consideration of individual IOU dynamic rate systems and processes to specific IOU application proceedings).

<sup>7</sup> *Ibid.*; see also 20 Cal. Code of Regulations (CCR) §§ 1621, 1623, 1623.1 (LMS Regulations).

<sup>8</sup> D.25-08-049, *Decision Adopting Guidelines for Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company on Demand Flexibility Rate Design Proposals*, R.22-07-005 (Aug. 28, 2025); see also CalCCA Opening Comments, at 8 (stating that the vital

recognized it failed to resolve this scoped item, but stated that it “*will address these issues in one or more new rulemakings.*”<sup>9</sup> A little over two weeks later, the Commission opened this DR proceeding, with preliminary scoping item 3 to consider “standardized data systems, communication protocols, and data transfer processes . . . to support demand response initiatives, *including dynamic rates.*”<sup>10</sup> CalCCA originally objected to closing the Demand Flexibility proceeding without addressing the necessary data systems and processes to allow all customers to access dynamic rates.<sup>11</sup> However, with the opening of this new, broader Demand Response proceeding, CalCCA now supports the Commission taking this issue up in this proceeding.

This proceeding is the ideal venue for discussing data access and data quality standards for both new and existing data systems and processes, as well as cost responsibility for those systems, even if IOUs must implement those standards through a separate application for cost recovery. The DR landscape will benefit from a level playing field in terms of data access, particularly for CCAs who serve a significant proportion of the load in California and many of whom have programs for their communities that will help spur the adoption of DR resources. If necessary, the Commission can incorporate a separate ratesetting track for this proceeding to address cost recovery for Commission and CEC required data systems and processes for dynamic pricing and LMS.

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data access issues CCAs have raised were not addressed in the Demand Flexibility proceeding before it closed).

<sup>9</sup> D.25-08-049, at 13 (emphasis added).

<sup>10</sup> OIR, at 10.

<sup>11</sup> See *California Community Choice Association’s Comments on the Proposed Decision*, R.22-07-005 (Aug. 14, 2025) (objecting to the Commission prematurely closing R.22-07-005 without addressing scoped issues to allow unbundled customers to participate in dynamic pricing: “While the [Proposed Decision] does address unbundled customers and dynamic pricing rate design, it fails to resolve scoped systems and processes issues, including CCA data access, and cost responsibility surrounding those systems and processes.”).

SCE’s argument that this proceeding’s scope “is not focused enough to consider the specific systems needed to implement each IOU’s dynamic rate proposal”<sup>12</sup> should also be rejected. Notwithstanding that the scope is currently being defined, SCE’s argument ignores the Commission’s plain interest, as demonstrated by preliminary scoping item 3 from the OIR,<sup>13</sup> in establishing a robust ecosystem of DR systems and processes, including those related to dynamic rates. The OIR recognizes that to implement the wide range of DR resources effectively, updates or amendments may be needed to existing systems and processes, regardless of how cost recovery will occur. Feedback from stakeholders and the Commission about IOU dynamic rate-related systems is valuable, and this proceeding brings together a wider range of parties than specific IOU applications. Additionally, simply because a proceeding has multiple priorities does not mean the Commission and parties cannot adequately address specific priorities. For these reasons, the Commission should reject SCE’s recommendation to exclude consideration of dynamic rate data systems and processes from the scope of this proceeding.

### **III. THE CONSIDERATION OF HOW DR RESOURCES CAN BE INCORPORATED INTO STATE CORE PLANNING PROCESSES SHOULD BE ADDED TO THE PROCEEDING SCOPE**

The Commission should adopt 350 Bay Area’s recommendation to consider how the deployment of DR resources can be incorporated into planning processes such as the CEC’S IEPR, the CPUC’s IRP and RA proceedings, and CPUC and CAISO transmission planning.<sup>14</sup> While the OIR recognizes the need to coordinate with other Commission proceedings given

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<sup>12</sup> SCE Opening Comments, at 17.

<sup>13</sup> See DR OIR, at 10 (“What standardized data systems, communication protocols, and data transfer processes should the Commission adopt or amend to support demand response initiatives, including dynamic rates?”).

<sup>14</sup> See 350 Bay Area Opening Comments, at 5 (recommending the need to incorporate deployment of cost-effective DR into the state’s core energy planning processes, including IEPR, IRP, and transmission planning).



overlapping topic areas,<sup>15</sup> the outcomes from this proceeding may require integration into larger state planning processes for benefits to be realized. For example, if certain valuation methodologies or frameworks for DR are modified through this proceeding that impact RA planning and procurement, then considering how to integrate those changes into larger, relevant state planning processes will ensure effective implementation of those changes. Failing to incorporate changes developed in this proceeding into larger planning processes could delay determining necessary logistics, which may also take time to implement (*e.g.*, waiting for the next planning cycle or annual report). While the Commission should not rush through important discussions in this proceeding, it should recognize potential impacts that outcomes from this proceeding can have on other proceedings, initiatives, and goals, including the state's 7,000-megawatt load shift goal for 2030.<sup>16</sup>

#### **IV. CUSTOMER ACCESS TO AND EXPERIENCE WITH DR PROGRAMS AND RESOURCES SHOULD BE CONSIDERED IN THIS PROCEEDING AS PROPOSED BY MULTIPLE PARTIES**

The Commission should include in the scope of this proceeding a discussion of customer-related topics, such as accessibility, incentives, environmental justice, and customer confusion. Olivine, Vote Solar, PG&E, SDG&E, and SCE recommend that the Commission consider the following customer-related topics related to the deployment of DR:

- *Customer experience improvements:* Olivine states that “[i]mprovements to the current customer experience, such as streamlined authorization processes, similar processes, and standard [service-level agreements] could have a significant impact on customer participation and administrative efforts.”<sup>17</sup>

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<sup>15</sup> See OIR, at 10 (asking whether any specific issues previously addressed or underway in other Commission proceedings require coordination with this rulemaking).

<sup>16</sup> See CEC Docket 21-ESR-01, *SB 846 Load Shift Goal Commission Report* (May 26, 2023).

<sup>17</sup> Olivine Opening Comments, at 6-7.

- *Environmental justice*: Vote Solar recommends the Commission include an environmental justice framework in this proceeding to help evaluate how energy infrastructure impacts disadvantaged communities and advance the locational specificity of DR resources.<sup>18</sup>
- *DER technology incentive requirements*: PG&E recommends the Commission “explore opportunities to enhance DER technology incentive requirements that streamline customer experience and increase program benefits.”<sup>19</sup>
- *Technical efficiencies*: SDG&E states that “[t]he customer’s enrollment in any program should be with a minimum of technical hindrance,” and that interoperability of devices would enable greater customer control.<sup>20</sup>
- *Clarity on DR programs to prevent customer confusion*: SCE recommends that this proceeding establish consistent rules for the definition and application of “qualified” DR programs to minimize customer confusion.<sup>21</sup>

The various issues demonstrate the many considerations this proceeding should discuss from a customer perspective. Ultimately, the success of DR resources depends on customers being aware of, learning about, signing up for, actively participating in, and realizing benefits from programs and initiatives that this proceeding will shape. Considering these customer perspectives while examining changing or establishing requirements for DR resources will increase the likelihood of success and ensure customer needs are met while also contributing to grid benefits. Additionally, in the case of SCE’s recommendation on “qualified” DR programs, particularly as related to the Self-Generation Incentive Program (SGIP), considering customer experiences in this proceeding will help minimize confusion and enhance customer choice of programs that satisfy their needs. Therefore, the Commission should consider party

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<sup>18</sup> Vote Solar Opening Comments, at 5 (describing the unfair distribution of burdens and benefits of energy infrastructure and the opportunity to address that through DR resource deployment).

<sup>19</sup> PG&E Opening Comments, at A-13.

<sup>20</sup> SDG&E Opening Comments, at 8.

<sup>21</sup> SCE Opening Comments, at 7-8 (describing the impacts to customers if changes are made to enrollment requirements, such as SGIP’s requirement to be enrolled in a “qualified” DR program).

recommendations regarding customer experiences and customer access to DR resources and programs to minimize barriers to customer adoption.

**V. SCE’S RECOMMENDATION TO ADDRESS RULES TO ENHANCE AND TARGET LOAD FLEXIBILITY SHOULD BE ADOPTED**

The Commission should include SCE’s recommendation to enhance and target load flexibility in the scope of this proceeding. SCE observes:

Largely absent from the existing DR rulesets, and not included in the proposed scope in this Rulemaking, is what policies need to be considered to better integrate and coordinate managed device load flexibility programs for local distribution-level reliability, affordability, and grid readiness alongside DR.<sup>22</sup>

This comment from SCE bears similarity in theme to PG&E’s recommendation to expand the scope and change the name of this proceeding to “Load Management.”<sup>23</sup> SCE and PG&E identify the convergence of technologies, program designs, and frameworks that provide load flexibility, which have historically developed independently of each other. SCE even points out that distribution-focused load flexibility programs provide direct load control capabilities that dynamic rates and DR programs cannot.<sup>24</sup> With this convergence, the Commission, along with stakeholders, should take stock and consider how DR resources and load management strategies affect each other, and where those resources and strategies should be implemented. All the benefits and limitations of load flexibility, DR resources, and dynamic rates should be considered in one place so they can be optimized together. Therefore, the Commission should adopt SCE’s recommendation to address rules to enhance and target load flexibility.

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<sup>22</sup> *Id.*, at 18.

<sup>23</sup> PG&E Opening Comments, at A-4.

<sup>24</sup> See SCE Opening Comments, at 19 (describing what load flexibility programs provide that dynamic rates and DR programs do not provide).

**VI. THIS PROCEEDING SHOULD INCLUDE PG&E’S RECOMMENDATION TO DEVELOP A FLEXIBLE POLICY FRAMEWORK THAT ENABLES VPPS TO PROVIDE MORE GRID SERVICES**

The Commission should adopt PG&E’s recommendation to include a flexible policy framework for VPPs in the scope of this proceeding. PG&E asserts that the current policy framework and processes “hinder the future-proofing of California’s grid by primarily limiting DR resources to providing peak load-shedding services.”<sup>25</sup> PG&E’s view of the future of VPPs is that they provide more than peak load-shedding services, including continuous load shaping.<sup>26</sup> Both load-shedding and load-shaping services provide grid benefits in their own ways, and both will be necessary to optimize California’s grid for a clean energy future. Development of a policy framework that further enables VPPs is an excellent example of an outcome that can be informed by existing preliminary scoping items, such as valuation of methodologies and evaluation metrics, and CAISO market integration topics.<sup>27</sup> When discussing topics like valuation methodologies or market integration frameworks, the Commission and stakeholders should have clear end goals or work products in mind. Planning for those outcomes through the future DR Scoping Ruling will establish a shared goal for everyone. Therefore, the Commission should adopt PG&E’s recommendation to develop a flexible policy framework that enables VPPs to provide more grid services in this proceeding.

**VII. THIS PROCEEDING SHOULD BE COORDINATED WITH THE CAISO’S DDEMI INITIATIVE AND THE COMMISSION’S RA PROCEEDING, AS RECOMMENDED BY SEVERAL PARTIES**

The Commission should coordinate the DR proceeding with the CAISO’s DDEMI initiative and the RA proceeding, as recommended by California Efficiency + Demand

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<sup>25</sup> PG&E Opening Comments, at A-6.

<sup>26</sup> *Ibid.*

<sup>27</sup> *See* OIR, at 9 (Preliminary Scoping Items 2.b. and 2.c.).

Management Council (CEDMC), PG&E, and SCE.<sup>28</sup> CalCCA agrees with CEDMC that “[i]t is critical to have good coordination between the Commission and the CAISO where both entities have jurisdiction over certain pieces of related issues, including DR.”<sup>29</sup>

In Opening Comments to the RA OIR, several parties, including CalCCA, recommended the Commission address RA issues related to DR.<sup>30</sup> As PG&E states, “[b]ecause there are likely to be DR implementation issues that are not within the purview of the RA OIR, work on this issue will need to be coordinated with the CAISO’s [DDEMI initiative and the DR OIR].”<sup>31</sup> The Commission should coordinate this proceeding with the CAISO’s DDEMI initiative and the RA proceeding to: (1) enhance SOD RA accounting for DR; and (2) develop policy related to behind-the-meter (BTM) exports.

**A. CalCCA Supports Enhancing SOD RA Accounting for DR in this Proceeding, as Recommended by CEDMC, EnergyHub, Olivine, and SCE**

The Commission should enhance the SOD RA accounting methodology for DR in this proceeding to allow DR to be shown beyond the availability assessment hours (AAH), as recommended by CEDMC, EnergyHub, Olivine, and SCE.<sup>32</sup> Current RA rules allow DR resources to be shown only during the AAHs. As stated by SCE, “[t]his means that DR cannot reduce a [LSE’s] RA obligation outside of the AAHs, even if a DR resource can provide capacity outside of the AAH window.”<sup>33</sup>

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<sup>28</sup> See CEDMC Opening Comments, at 5; PG&E Opening Comments, at A-13; and SCE Opening Comments, at 20.

<sup>29</sup> CEDMC Opening Comments, at 5.

<sup>30</sup> See *California Community Choice Association’s Comments on the Order Instituting Rulemaking*, R.25-10-003 (Nov. 4, 2025), at 11; and *California Community Choice Association’s Reply Comments on the Order Instituting Rulemaking*, R.25-10-003 (Nov. 14, 2025) (CalCCA OIR Reply Comments), at 4-5.

<sup>31</sup> PG&E Opening Comments, at A-13.

<sup>32</sup> See CEDMC Opening Comments, at 7; EnergyHub Opening Comments, at 10; Olivine Opening Comments, at 5; and SCE Opening Comments, at 20.

<sup>33</sup> SCE Opening Comments, at 20.

The SOD framework made significant changes to the RA program by requiring LSEs to show capacity for all 24 hours of the worst day of the month. Constraining DR RA showings to the AAHs could potentially ignore the reliability value that DR resources could provide under the SOD program. As stated by Olivine, DR should be able to provide RA in SOD hours “... where they can demonstrate availability and performance capability.”<sup>34</sup> The Commission should therefore consider enhancements to SOD RA accounting for DR in the scope of this proceeding and/or in the RA proceeding.

**B. CalCCA Supports Including BTM Exports in Scope, as Recommended by PG&E, CEDMC, and CESA**

CalCCA agrees with PG&E, CEDMC, and CESA that the Commission should coordinate with the CAISO to develop policy related to BTM exports, including reviewing the Load Impact Protocols.<sup>35</sup> In the CAISO’s ongoing DDEMI stakeholder initiative, the CAISO is considering a modified Proxy Demand Resource model to improve the ability of BTM resources to participate in wholesale markets by crediting net exports and revising metering requirements.<sup>36</sup> As recommended in CalCCA’s Opening Comments to the RA OIR in proceeding R.25-10-003, the Commission should develop policy related to BTM exports, including the development of a qualifying capacity (QC) methodology.<sup>37</sup>

In developing a QC methodology for BTM exports, there are several key questions that must be addressed in coordination with the CAISO. This proceeding and/or the recently opened RA proceeding should address these questions in alignment with the CAISO’s efforts. As the

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<sup>34</sup> Olivine Opening Comments, at 5.

<sup>35</sup> See CEDMC Opening Comments, at 6; PG&E Opening Comments, at A-13; CESA Opening Comments, at 3.

<sup>36</sup> Sunrun, Tesla, Inc., & California Solar & Storage Association (CalSSA), *Behind-the-Meter Storage Participation in Wholesale Markets, CAISO DDEMI Working Group* (Sept. 9, 2025).

<sup>37</sup> See CalCCA OIR Reply Comments, at 4-5.

CAISO develops its market and deliverability rules related to BTM exports, the Commission should simultaneously develop the necessary rules within its jurisdiction, including the development of a QC methodology. This should include reviewing the Commission's Load Impact Protocols, as recommended by CESA, to ensure the protocols are fit for measuring BTM storage resources.<sup>38</sup>

### **VIII. SCE'S RECOMMENDATION TO HOLD WORKSHOPS TO CLARIFY THE PROPOSED DR GUIDING PRINCIPLES SHOULD BE ADOPTED**

The Commission should hold one or more workshops to clarify the proposed DR Guiding Principles, as SCE recommends. Twenty-two parties recommended modifications to the DR Guiding Principles proposed in the Energy Division Staff Proposal attached to the OIR.<sup>39</sup> This level of engagement from this many parties suggests the Proposed DR Guiding Principles need more room for discussion before the Commission adopts them. One or more workshops will allow Energy Division to ensure parties understand the intent and wording of the Proposed DR Guiding Principles and will allow parties to get clear answers to clarifying questions as well as discuss differing opinions to reach a consensus. Since DR Guiding Principles underpin the central issues in this proceeding, taking time to ensure robust engagement by all stakeholders is extremely important. Therefore, the Commission should adopt SCE's recommendation to hold workshops to clarify the Proposed DR Guiding Principles.

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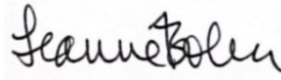
<sup>38</sup> See CESA Opening Comments, at 3.

<sup>39</sup> Opening Comments of CalCCA, PG&E, SDG&E, SCE, CEDMC, LEAP, Voltus, The Utility Reform Network, Enchanted Rock, LLC, Vote Solar, Olivine, California Large Energy Consumers Association, the Joint Regional Energy Networks, Cohen Ventures, Inc., Small Business Utility Advocates, CPower Energy LLC, The Mobility House, CAISO, EnergyHub, 350 Bay Area, Renew Home, and CalSSA all recommend modifications to the Proposed DR Guiding Principles.

## **IX. CONCLUSION**

CalCCA appreciates the opportunity to submit these comments and respectfully requests adoption of the recommendations proposed herein.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Leanne Bober", is centered below the "Respectfully submitted," text. The signature is written in a cursive, flowing style.

Leanne Bober,  
Director of Regulatory Affairs and Deputy  
General Counsel

CALIFORNIA COMMUNITY CHOICE  
ASSOCIATION

December 1, 2025