**Demand Flexibility OIR (R.22-07-005) Workshop on Track B Working Group Proposals-20231017\_132458-Meeting Recording**

October 17, 2023, 8:24PM

1h 57m 59s

 **Gupta, Aloke** 0:03  
And if you know, and if it's real time, then optionality as far as our or 15 minutes or five minutes in alignment with the Kaiser market.  
Ohh now for now how did and the the the temporal aspect of the pricing would be determined by the LC associated with the rain or the LCD.  
Decide whether the customer on a particular win would be settling on a day ahead basis or on a real time basis, and if it's real time, then the appropriate time granularity as long as the purse, the price machines are, you know, support staff.  
Ohh, that time option?

 **Chetna Smith** left the meeting

 **Gupta, Aloke** 0:42  
Umm.  
So in terms of geographical granularity, we're saying that and the the different price for instance, do not have to be aligned on geography.  
You know the generation capacity could be on a on on one geography and the distribution component could be for example based on Delap and the and the generation component could be on a smaller geography at the time.  
Granularity, however, must be aligned between the different price functions.  
So so the LCD is choosing, you know, a real time.  
I'm granularity then the distribution price function would have to be aligned with that.  
So that's Part B of the three part functionality I I guess everything I just talked about in the in the last two slides is summarized graphically.

 **Heather Y Mo** joined the meeting

 **Gupta, Aloke** 1:36  
Here the cloud represent the price machine.  
The different price functions.  
But, umm, in the middle here that are being fed with conditions as endpoints and so the price machine is computing umm every hour?  
Or or the children time granularity and along with the Kaiser supplied locational marginal price from the wholesale market, everything is added together to provide a competitive priced to the price portal.  
Presumably Midas.  
Umm, so that leaves one more function of the three part functionality I referred to and that is to maintain.  
Umm and indexing table.  
So given that the price machine would be combining price functions from different entities into a composite price which has a unique ring associated with it, and given that the different entities could have multiple price function, it becomes necessary to to maintain an indexing table that keeps track of which combination of price functions or associated with a particular ring.  
Uh, so we think the price machine is an appropriate place to maintain that indexing table, not the assignment of the customer to a particular rent could be considered confidential information.  
So we would expect the LC to maintain that information and it may not necessarily be available umm to price per portal or the price machine.

 **Chetna Smith** joined the meeting

 **Gupta, Aloke** 3:13  
I get the the proposal assumption is that it is actually not available to either the price portal or price machine.  
Uh, so that concludes the three part of functionality and then we talk about well.  
So this is an illustration of the indexing table.  
You know, we've covered that in another working group meeting, so this takes too long to explain.  
So I'm hoping that people, I mean, if you have a question then please ask.  
So lastly, the the third part of the three part proposal addresses the implementation and administration.  
Again, there are two parts to it.  
Parts in terms of implementation, the proposal suggests that there would be a consolidated statewide price machine for all three utilities and their associated umm I'm burned out addresses as well as the point of releases.  
Umm.  
And then associated with that, uh, on the administration side, the proposal is suggesting that and that there would be a a price machine administrator entity.  
Umm, that operates independently of the distribution companies and the LCD.  
Umm.  
And that entity would be.  
Umm would be identified if you look at .5 at the bottom, that PM would be selected by the CPC or through some process defined by the CPC, but the the.  
But the key point is that it's operating independently of the utility and, and let's see then the rationale for this is, well, the objective of the IRS is to scale or demand flexibility.  
The thinking is that it is important to involve unbundled analysis to achieve a scale, and that's one point.  
The other point is that it's important to standardize things.  
Umm so that you know LLC's have a similar experience as well as third parties have a similar experience regardless of, you know, which utility?

 **Parimalram's Meetgeek Notetaker** left the meeting

 **Gupta, Aloke** 5:23  
Umm is being in which utilize the customer resides in so so all of that suggests in our minds and I or all of that is the rational and the proposal umm to uh.

 **Reyes Lagunero, Jennifer (Law)** left the meeting

 **Gupta, Aloke** 5:43  
But the idea of a price machine administrator being independent of the respective entities, the PM A, the price machine administrator would be responsible for all the necessary functionality.  
Like you know, development of the IT systems operation and maintenance.  
Ohh and I you know, the assumption here is that the PM would have, you know, pursue a phased implementation approach starting with some minimum set of requirements that would be presumably defined by CPC for initial implementation, but over time more functionality could be added as umm other experiences gathered.

 **Nihal Shrinath, Sierra Club** left the meeting

 **Eva Molnar** left the meeting

 **Gupta, Aloke** 6:26  
Umm.  
And you know more feedback is provided by LSE and the UTC ohm.  
Then you know there was some concern expressed in one of the party comments about no alright issues.  
So yes, the PM should be looking into backup mechanisms and in in case there is a R is in the primary system, you know backup mechanism could be you know some kind of resiliency or it could be some kind of a backup of predefined rate.  
Umm, that that's something for parties to consider.  
Umm, I think the other details are sort of self explanatory.  
Yes, I think that was the last light just to just in terms of the price machine functionality.  
So I wanted to leave time for questions.  
If there are questions otherwise you know if we we can move on to the utility proposal and sort of give them more time.  
But let's take your questions now.

 **Madduri, Parimalram "Achintya"** 7:35  
Uh looks like OK.  
Akin has her hand, and so my question is.

 **kay aikin (Guest)** 7:41  
It's probably way down in the weeds, and that's Cypress security.  
So if I understand the proposal is you will be pulling scatter data in order to create the price components you're gonna be pulling scatter data from the entire system, running it back to one or three servers depending upon actual architecture, and then having the lookup table for individual flexible devices to look up their particular price components for their their location, their spot location.  
So to me that is a single point of failure.  
If you do not cyber secure that correctly, the whole system can be can be hacked and you end up creating a situation where plus or minus every device goes in and and starts going, starts responding to a spurious price.  
But I I I don't know.  
You know my security clearance, my military security clearance is currently sitting in a server somewhere in China.  
I I'm very, very low to.  
Uh commit to a single point of failure. Yeah.  
So.  
So thank you.

 **Gupta, Aloke** 9:02  
Umm, uh.  
Of all, uh, I I just want to briefly state that there's the presumption about the implementation being a single, a single point system.  
And so before I elaborate on that, let me address this other question about the lookup table by device users.  
So I think and the name either either I summarized it inaccurately or you misunderstood the the indexing the profit of the indexing table.  
Then the purpose of the indexing table is simply an internal function to the price machine.  
It's not something that customers or third parties need to contend with.  
The customers and third parties were done through the rinse switching tool or whatever mechanism you know would already know what rate identifying number they're they're associated with.

 **Schenck, Lauren** joined the meeting

 **Gupta, Aloke** 9:56  
I mean, see, she has proposed requiring a ring cord on the customer's bill, for example.  
So my point is that I I totally get that I use.  
I use lookup.

 **kay aikin (Guest)** 10:05  
Table in the in the the software world type idea it's you know you're you're you're looking for my pride.  
I I I need to get my price right.  
OK, so send it you send a message and say give me my price.  
So in terms of the?

 **Gupta, Aloke** 10:21  
Price and reaction mechanism ohm I mean I I think that's an implementation detail for PM to umm to address balancing all the requirements including cyber security and so that could translate into multiple server that couldn't that could translate into this aggregated price generation et cetera so.  
Umm the the key point is that, well, umm, the price generation mechanism?  
Umm is is under the oversight of an independent entity and and is separated from the distribution companies and the LC's.  
But the implementation I think we're leaving wide open.  
Is that helpful?  
OK.  
Yeah, that's helpful. OK.  
I see another hand.  
That's yeah, yeah, Ashkan.

 **Madduri, Parimalram "Achintya"** 11:16  
Hey.  
Hi, how are you guys?

 **Ashkan Rahimi Kian** 11:18  
Is uh.  
Thank you for the great workshop and a lot.  
Thank you for the presentation and explanation.  
I also typed my question there.  
You know how effective and accurate the Timex price machine has been so far in the executed pilot projects in California.  
I mean the SC area PG and E Clean Valley energy, you know, agricultural feature or something.  
To my understanding, it is very important that this price should reflect so many different things should be very.  
Consistent and and basically dependent.  
To LMP California LMP zonal prices, marginal cost of production capacity.  
Uh, you know so many different factors.

 **Sabrinna Soldavini** left the meeting

 **Ashkan Rahimi Kian** 12:15  
And I based on my understanding, these these are quadratic process price functions.  
We 3 coefficients that you have to estimate them continuously.  
If you wanna make them dynamic with you know to to capture every change in the price.  
Umm, so can you explain how successful and accurate have been these price output so far?  
So I think you were gonna say something.  
Well, I could answer or if you wanted to dance.

 **Madduri, Parimalram "Achintya"** 12:47  
Sir.  
Well, you're why I just simply wanted to make the.

 **Sabrinna Soldavini** joined the meeting

 **Gupta, Aloke** 12:49  
Point that no, I think the question you're asking asking is more a a a working Group 1 tab proposal question here.  
We simply talking about the price generation mechanism and you know, using whatever the price function is, that's been defined by the entity, the appropriate entity.  
So to the extent the appropriate entity is choosing ohh a quadratic function or some other you know.

 **Chetna Smith** left the meeting

 **Chetna Smith** joined the meeting

 **Gupta, Aloke** 13:20  
I'm more elaborate function that that you would consider more accurate.  
I think the idea would be the price machine would could accommodate either, so I don't wanna you know in in the context of this proposal, I don't want to defend address the merits of a particular price function design.  
Ohh, thank you.  
Thank you for.

 **Ashkan Rahimi Kian** 13:39  
Making that clear, but the achintya if you wanna add something to it, I I appreciate that.  
Yeah, I mean I I think it's it's.

 **Madduri, Parimalram "Achintya"** 13:47  
You know, to clarify the way that the price function is defined is there's an assumption of there's a test year's load.  
So there's an assumption of what a system is going to look like, and this is this is also, I will note how essentially all rates are made and then based on that load and you know a a function that links a load level to a price.

 **Iezza, Robert W** left the meeting

 **Madduri, Parimalram "Achintya"** 14:12  
Umm, the revenues are calculated and and every rate should be revenue neutral which is that they should all essentially based on sort of an assumed load shape should all have the same recovery of revenues.  
And so the dynamic price is is done similarly or the capacity functions of the dynamic price are done similarly now on on, on an hour to hour basis.  
Uh, there is a a real time projection of system load that's fed in.  
So the day ahead projection of system load is fed into the price function, but the coefficients aren't being recalculated.  
It's just the price that's being recalculated based on the input, so there's a set coefficient that it's a quadratic function that links as its input that it takes as its input a certain load.  
So let's say system that load and has an output of a price, and that's sort of how the price is being calculated.  
So, umm, you know that in terms of accuracy it's it's sort of done ahead of time based on an assumed net low profile and and assumed amount of revenue that would be recovered.  
But that's separate from maybe.  
I'm not sure what what the technical accuracy is.  
The question that you're asking, which is, are there any errors?  
Ohh yeah both actually because you know.

 **Ashkan Rahimi Kian** 15:42  
Well, this is a time series.  
You we are talking and things can change the topology, the load and I believe whether you use a you know regression model or or neural network based model.  
Umm, every now and then things change and you should retrain your system so those coefficients should be updated based on any topology changes.  
Any load profile changes seasonal changes, things like that to be captured accurately.  
So that's the technical part and then the efficiency that I'm talking.  
You wanna engage as many as customers and prosumers as you want to make this a successful program, right, to help the utility, the system operator for demand, flexibility, demand response, especially when you have lots of EV trucks, DC fast chargers in hot summer times in California, it should be effective.

 **Barr, Amy** joined the meeting

 **Ashkan Rahimi Kian** 16:37  
So people should engage and and help you know, as a win win situation for both the utility.  
And the customers and prosumers, you know, so that blackouts, brownouts and heat waves, you know, when they caused them, you know, you systematically avoids or mitigate such situations instead of sending SMS and and messages to people that please do not charge your Tesla or something.  
So yeah, both technically and and basically in implementation should be efficient to in my opinion.  
We gotta make sure of that in the pilot projects.  
That's that's my point.  
Thank you.  
Umm, I think we have a few more minutes.

 **Gupta, Aloke** 17:23  
It's a so no.  
Are there more questions about?  
Yeah.  
Yeah.  
System Michael, I I think so, alright.

 **Madduri, Parimalram "Achintya"** 17:32  
There's another hand raised Michael Konya, Konya.  
No. No.

 **Michel Kohanim** 17:38  
Hi.  
Michelle there.  
First of all, I agree with Kayo's suggestions and what I'm wondering is how does a price portal without authorization and authentication work for subscription tariff?

 **Madduri, Parimalram "Achintya"** 17:58  
I mean, I mean how?  
I'm not sure if I understand the question, but you know the a form of a subscription tariff has been in effect since the early 1990s.  
So yeah, but isn't the subscription.

 **Michel Kohanim** 18:13  
I have that we're discussing here tied to a customer.  
I mean, that's how it's been done in the in, in Georgia.

 **Madduri, Parimalram "Achintya"** 18:21  
Power since 1991, so each customer how do they?

 **Michel Kohanim** 18:25  
They get access to their specific tariff in the price portal.  
Yeah.  
So so the authorization and authentication done for a specific customer to get his or her.  
Umm price for that specific moment in time in the price portal.  
That's the question.  
Does the Michelle the the.

 **Gupta, Aloke** 18:48  
The presumption here that Midas is only providing a public public.  
Umm Ohh price stream that is focused on demand flex?  
Yeah, if if you remember my first slide, there was references to other system, my subscription manager and transactive platform.  
So we would expect additional information to be communicated by those systems, different pathways to the customer.  
So not through Midas.  
Got it.  
So basically for.

 **Michel Kohanim** 19:19  
For a third party, they have to go to multiple systems.  
In case of a subscription tariff, to get the exact price or at that moment in time for that specific customer, yeah.  
So I I you know.

 **Gupta, Aloke** 19:33  
It gets to be long conversation to talk about the exact price means, so let's.  
But yes, the answer to your question is the mirrors would only provide the the volumetric demand flex signal.  
I would not provide under this proposal all all, all aspects of a tariff that the customer might be subjected to. Right.  
Thank you.

 **Michel Kohanim** 19:57  
But I I think it's worth clarifying.

 **Madduri, Parimalram "Achintya"** 19:59  
Thing that you know the if if if a customer was just getting a subscription was was on a subscript of tariff.  
Taking aside the transactive element of it all, umm, their subscription is known well ahead of time.  
It's a one time agreement that is between the customer and the LSE.  
That's again how it has been implemented in the past, and so then the price that is coming is the load flex signal for instance, that is coming through Midas.  
Yeah, but that doesn't tie back.

 **Michel Kohanim** 20:29  
Or the authentication and authorization for a third party to get that information for that customer. Right?  
Because then you will need customer information for within Midas customer ID, customer, whatever and then the customer has to give the third party explicit authentication authorization to access that information.  
Otherwise, there will be no privacy as case suggest.

 **Gupta, Aloke** 21:03  
Yes, I I think you you're reading a point about.  
Hmm.  
Ohh something not related to the price machine, so maybe right?  
Brandon, were you trying to address Michelle or have a different question?  
Yeah.  
Well, I I was gonna address him. I.

 **Brandon Sanders** 21:20  
I think what you know, this discussion is actually helping me think about some things you know and under this subscription model in order to what what I think Michael is saying is in order to determine what the customer is gonna pay or gonna be credited with under under a subscription model, you really need three pieces of data.  
You need the dynamic price which is gonna come out of the price machine.  
You need the subscription level, which would come from another system, a subscription manager which the join our use we'll talk about in a minute or or something else, and then you would also need to know the customers usage to know where where they're at right in that in that subscription level.  
So I you know Michael is that is that kind of where where you were getting at, I don't know if you said it that that explicitly but that's how I was understanding it exactly with one more component.

 **Michel Kohanim** 22:06  
It as a third party, the customer has to give the third party the authorization to get to have access to that.  
So we have we, we have third party access to.

 **Brandon Sanders** 22:16  
Usage data today.  
It's not.  
It's not in real time, but we have, you know, something like that.  
And so I think what you're what you were pointing out is that if things are not in one system, there may need to be multiple points of access or or multiple systems.  
That information we have to be pulled from, OK.

 **Daniel Douglass** left the meeting

 **Brandon Sanders** 22:31  
I just wanted to make sure I was.  
Understanding it all, I don't have a I don't have a comment or an opinion on it, just wanted to clarify.  
Yes, exactly.  
Thank you.

 **Michel Kohanim** 22:40  
And I think I I did all.

 **Gupta, Aloke** 22:41  
The one note, Brandon, that I I think some parties would know it or argue that, you know, knowing the usage.

 **Lucas Utouh** joined the meeting

 **Gupta, Aloke** 22:53  
Umm Ohfa customer or knowing the subscription?  
Umm, it's not critical to optimizing our demand flex response by the individual devices on the on the on the customer side, the customers can you know the devices can individually optimize against the dynamic rate?  
No, no, without having to know.  
The youth is at the moment well sure, but wouldn't you have to know the usage?

 **Brandon Sanders** 23:22  
Just the moment in order to determine the actual financial benefit or detriment to the customer so that you know whether they're below or above their usage for that their subscription level for that particular hour or am I not understanding it correctly?  
So I think the point that I've heard people make is that.

 **Gupta, Aloke** 23:36  
As long as you are, uh, you know arbitraging against the, you know, the dynamic prize you are getting the maximum benefit.  
So it's not something you need to figure out.  
You are getting the maximum benefit if you're responding to the price signal, but anyway.  
So, umm, you know, let me, I think we're past 3 minutes past time.  
So yeah, I'll be ready to wrap up here with India or are we see any more questions?  
I'm not able to see the full screen.  
No, there's no other.

 **Madduri, Parimalram "Achintya"** 24:04  
Hands raised umm.  
And so I think we can move on and and I think with regards to the point about optimizing a bill that that is one of the elements that we discussed during the working group.  
And and I think energy division staff has argued that under the proposal that energy division has laid out, it's does not matter what the subscription level is, are knowing what subscription level is because the behavior response is optimized based on the dynamic price on the load chip signal.  
And we are you taking over the IU proposal?

 **Gupta, Aloke** 24:41  
But.

 **Madduri, Parimalram "Achintya"** 24:45  
You're muted brand.  
Rounded you send muted.  
I was telling so many good jokes that I can't.

 **Brandon Sanders** 24:54  
Yeah, I can't retell now because I was muted alone.  
I I decided to stay on because I am the first speaker here, but as usual I need to bring bring my friends.  
So I'm Brandon Sanders with Southern California Edison.  
I'm a senior project manager and pricing implementation here.  
I'll be joined by Jamil Pueblos.  
We'll be running the slides for us from Edison as well as I, Dwight Phelps from Edison, who will present one of the slides on CCA.  
I'll also be joined by Jeff.  
Dietary from San Diego Gas and Electric to present some of the topics, as well as Andrew Owl from or from Andrew I almost hired you over here at SE Andrew, all from PG and E Up North to help me, so thank you all a Jamil, can you go on the next slide?

 **Jeff S** left the meeting

 **Brandon Sanders** 25:44  
We'll just take a look at the agenda really fast here.  
So we'll we'll go through the the price machine and the other the other systems as well as a couple of other topics including CCA enablement.  
I will just give a short intro and say that I'm glad that we are are following a load in his presentation.  
Overall, a kind of a summary of where the IOU's are sitting with our proposals and our addendums is that we generally agree with the major points of the functionality and the major systems that have been proposed by CPC Energy division, and that Alok just outlined for us.

 **Daniel, Rebekah** joined the meeting

 **Brandon Sanders** 26:23  
So you'll see that we don't think that there's a a major system missing.  
We don't think that there is a, you know, massive functionality that has that has been left out or anything like that.  
Generally, what our proposal does is it tries to add some additional flexibility, optionality and includes some minor things that we think are missed, but but needed in the proposal for these systems needed to support demand, flexibility, pricing.  
So I just wanted to put that out there in the beginning, but you know generally we agree with the the major points that have been made and what we are really doing here is just trying to add some flexibility or some additional flexibility to the already flexible proposal that energy division staff has made.  
So, Jamil, you gonna advance?  
I'll start off with going to going through the price machine, so you'll see here and like I just stated in our proposal for the price machine, the functionality of our price machine is an exact match to the functionality of the price machine that has been proposed by staff.  
We think it should compute the time dependent price for for customers.  
As a log just laid out, we are we are totally aligned on on that point.  
As far as maintaining rims and sub Rins had a slide on this.  
It it is a complex subject and he went through it, he he, I don't know if I would say he skipped over.  
He went through it very, very quickly.  
We we agree that the price machine may be a place to maintain the complex kind of array of rings and subrings, but it's unknown at this point exactly what that that whole world looks like.  
We're continuing to have discussions about, you know, modifiers and and which modifiers to Rins are, you know most important to consider and and other items like that.  
So I would say that until that landscape is is more well known.  
We think that that should be an option of the price machine and that it may be determined later that there is a better system to maintain that matrix.  
Either another system that we haven't thought of or might as itself or somewhere else that may maintain that, and as far as here and we have a couple of rows regarding CCA adoption.  
Just a couple of scenarios that are not addressed in the Energy Division staff proposal that we think should be addressed in in guidance.  
One is, you know what?  
What would?  
What would be what would happen to the price machine if it's particular CCA would not adopt Cal Fuse?  
You know the IUS proposal as clarified after some some comments is that the price machine would be made available to both bundled and unbundled customers and that the cost would be recovered from all customers regardless of whether a particular CCA were to use the price machine.  
So that's I think the best phrasing that we have for this based on some comments that we received.  
Finally, as as far as price consolidation and the IRA's proposal does not require that the price machine consolidate IOU and CCA prices, it holds this as an option.  
So we think that that might be a functionality that makes makes sense to how housing the price machine.  
But at this point, we're not sure.  
So we think that that should be an option.  
Finally, probably the biggest.  
A additional item that we have on the price machine itself is the number and price.  
The number of price machines who would administer them and where they would sit, the Energy division staff proposal is a low has just gone through, has basically one proposal for a statewide price machine that would have a third party administrator that would be contracted to the CPU C and the join IUS have three options.  
One is a centralized price machine.  
Uh, very similar to what?  
A load just presented to us and the other is that each IOU would host a price machine and that the CCA's that are in that IOU territory would have access to to that price machine.  
So essentially you'd have you'd have three and then the other option is that each IOU and load serving entity would would host their own price machines, and at this point and or at the point when we made this proposal and I think still still now and there's still is enough unknowns out there regarding the various proposals for demand, flexibility rates and the various options for CCA participation and whether rates will be generation delivery, both or combination thereof and other features that we think that all three of these options should be available for applications for, for folks prefer organizations making demand applications for demand flexibility rates.  
So I'll pass it off now to Andrew, who will go over the next section.

 **Au, Andrew** 31:41  
On Andrea from PG and E so in the event that the LCD and our UC have transactive and subscription based rates, separate systems will be needed to carry out those functions.

 **Lee Ewing (CPower)** left the meeting

 **Au, Andrew** 31:55  
The transactive platform would allow customers to purchase the energy price at the marginal cost.  
Our proposal is largely in line with what the Ed Staff proposal was for the subscription manager.  
There was a good dialogue just now about what it's capabilities need to be and some of the concerns and access issues and we agree, but the subscription platform would be responsible for calculating each individual customers subscription load profile and it would also have to be designed to create load profiles in the event that customer doesn't have historic information or there was large changes to their loads or you know, however, we set up the subscription in the rate design.

 **Iezza, Robert W** joined the meeting

 **Au, Andrew** 32:37  
Umm, uh.  
We also think so.  
So those from that regard, our proposals are largely similar, some areas where we had different opinions or different alternate ideas.  
One is that in the event that the subscription can be modified by the customer, there would also need to be a portal where the customer can go and set their subscription, or change it.  
Or, you know, do do whatever they need to do on their end.  
We believe the transaction should be an optional feature to customers.  
They don't want to participate.  
They don't have to, and then they would just be subject to something like the day had price or the dev price.  
Umm.  
If an LS in for an unbundled customer, if the LCD does not offer transactions, then the UDC's would not for those customers, so there wouldn't be some Frankenstein rate where they would have transactions on the TD portion but not the generation.  
Uh.  
And then we believe the subscription and transactive system should be administered by the IOU's, cause it's tightly combined with our billing processes.  
Got.

 **DeTuri, Jeff N** 33:51  
This is Jeffrey from SDG and E talking about the price portal.  
So right now the best option for the price portal is the CC's Midas system, and I think the working group all agreed that, you know, it's already built ohm.  
It's the CC's paying for it.  
So until such time as somebody else comes up with a better option, that's gonna be the default option.

 **Brandon Sanders** 34:26  
Me?  
Umm so with this slide is, uh, is mostly reminder.  
Just to remind everyone that the this the systems that we're talking about here both in the energy division proposal and what you just heard from the IOU's are just the the net new systems that need to be implemented and designed and developed in order to implement these new rates.  
All of the existing systems that we that exist today, and I said net new, I my Midas exist we we are using it we'll we'll be using it much more and in a much more advanced way under this but but Midas does exist.

 **Au, Andrew** left the meeting

 **Brandon Sanders** 35:04  
So I guess they're not all net new, but the the, the new, newer systems that we would need in order to affect demand, flexibility, pricing, all of the existing systems are are billing system, our customer facing tools that help them that help customers to choose between different rates and you know alert them as to the counted their next bill will be and and everything else that we use it in any sort of a typical new tariff launch or new tariff update all needs to be updated as well.

 **Amanda Myers Wisser (Guest)** left the meeting

 **Brandon Sanders** 35:38  
And so there was some discussion this morning regarding the timeline and I think we had PG and E's timeline as an illustration that we were discussing.  
And I think Eva Molnar from SCE chimed in to talk about how complicated of and and implementation this would be.

 **Streib, Tysen** left the meeting

 **Brandon Sanders** 35:54  
This is some of the reason why it's because there's many new systems that are brand new and many existing systems that will have to be updated with a new set of rules and and a tariff that is on the complex side of the types of things that we implement.  
So this slide is just a reminder to all that we just because we haven't gone into great detail on updates to the IAU billing system for example, doesn't mean that those are not also needed.  
Just means that that's not a net new system that's required in order to affect demand flexibility, pricing.

 **Eva Molnar** joined the meeting

 **Brandon Sanders** 36:33  
Move on to our, uh, IOU specific CCA enablement slides.

 **Brent L. Coleman** joined the meeting

 **Brandon Sanders** 36:42  
Thanks, Brandon.  
This is John.

 **Lin, John** 36:44  
Myself and Albert were tacting this Andrew have to momentarily drop off.  
Yeah.  
So this is uh, John PGN uh and CC enablement.

 **Udwin, Trevor** joined the meeting

 **Lin, John** 36:55  
So we have 5 proposals.  
I'll cover one in five.  
The first one where CA recommended some improvements in access to enable data for CC forecasting we we note that PG and E delivers.  
Umm yeah.  
Data the same data to CCS, which we ourselves generally know forecast for.  
And in general, we have been able to provide I the input data is to for example to share my data system or the UI system and for share my data system within two business days we've had reports of isolated issues that we've generally addressed and we've continued outreach efforts to the CCA's and we we we have our door towards wide open to receive more feedback so that we can together proceed to improve the system.

 **Esther Ruiz-Muniz** left the meeting

 **Lin, John** 37:49  
But at the current stage, we understand that our system is complying with the general request, but always open for discussion to improve access for our CPA partners.

 **June Bote** joined the meeting

 **Lin, John** 38:07  
Albert. Hi everyone.  
Uh, so for #2?

 **Chiu, Albert** 38:11  
Which is the building quality interval data?  
Umm, PG and E plans to.  
We are planning to upgrade our EDI system to be able to support 600,000 SSID by December 23rd.  
So with this plan, we should be able to accommodate the request from the CSA in this area and then for #3, uh, which is providing uh yellow LP program.  
Or.  
Proposal.  
Uh, pointing out that, UM, uh PGN is open to provide uh residential.  
It uh with we crashed and and for the non residential subgroups we we feel like that that need to be more discussions with CPU C&C in order to provide those data because they are third party arrogate is involved.  
So we think it is more complex in that area and and we are continue to work with CPC in these areas to figure out if we can indeed provide this information to C, say in the future.  
Umm.  
With that, I will go to #4 build persimmons.  
I see you know, similar to #2, we we do plan to allow build P segments for bundle and unbundle customer for the upcoming rates and potentially the future expanded careful pilot.  
John #5?  
Yeah, sure.  
Yeah.  
And #5.

 **Lin, John** 39:52  
I've I'm with with respect to CC's ability to change the customer rates and this particular requirement or specification overlaps with the CCLS statewide.

 **Lee Ewing (CPower)** joined the meeting

 **Lin, John** 40:03  
Umm yeah.  
Tool and and so our thinking is that when PG and E works with the larger group within CC LMS working group and starts to build the system that we would provide capability to enable the obviously the third parties to facilitate the customers rate changes but also extend that functionality to CCAS as is possible and so we will be looking for forward to the CCLS statewide a tool defining process to help specify this functionality.

 **Baum, Kayla** joined the meeting

 **Lin, John** 40:55  
Brandon.  
I'm gonna hand it over to Dwight.  
I've talked to.

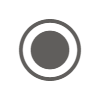
 **Brandon Sanders** 41:01  
Enough.

 **Dwight Phelps** 41:06  
Then if I cut out at any point, please let me know.  
I hope that I do not Dwight Phelps.  
I think California Edison going over some of the challenges we face or that we see in the CCA space for implementing dynamic pricing first was brought up the forecasting and settlement needs.  
This is something that we have actually at this point implemented a cloud based platform that can provide the raw interval data within two business days that was implemented in late September and we're working with Ccas, uh and their billing agents to make sure that any issues that come up are being addressed.  
So that's something that's actually in place, slightly more updated than than we show in our slide or the data needs for customer enrollment, especially related to ERP.  
This is something we where we want to continue to use the processes that are already in place.  
We actually received requests from CCAS during the summer and provided lists from two of our CCAS on ERP enrollment and we would plan to continue to do that as we move forward.  
For Bill presentment, we do see a challenge with the we do see a slight challenge with their request regarding RTP and we do think that related to RTP those should be discussed after the the RTP rate design right rate design phase has been completed, but in general the EDI information that we get from CCA's is limited to plain text and if we were gonna go above and beyond that it would require a new kind of scoping and understanding of what exactly we could include.  
We have not developed build resentment related to the call fuse pilot at this point.  
And there was and sorry, the CCA inability, CA inability to fulfill customer rate changes like was just said.  
But before me, we think this is linked to the LMS statewide tool and would want to continue the discussion in in that form as well.  
There were a couple of notes.  
Just if the demand demand flex pricing is a generation only product, there would not be a need for associated change IT delivery rate.  
But if it is a delivery and generation product, then we would need to to work on kind of two way communications to make sure that we can efficiently implement that.

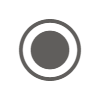
 **Mann, Ryan (Enel North America - USA)** joined the meeting

 **Dwight Phelps** 43:31  
Thank you, Brandon.

 **DeTuri, Jeff N** 43:39  
So uh for SDG and E's CA moment?  
Umm, we're building a technical solution for providing near real time data that should be completed before the end of the year.

 **Madduri, Parimalram "Achintya"** stopped transcription

 **DeTuri, Jeff N** 44:02  
Our CCA's already receive customer participation and event based rates including ERP and so you know if ordered to do so in this proceeding will share any other relevant Dr program information for Bill presentment.

 **Madduri, Parimalram "Achintya"** started transcription

 **DeTuri, Jeff N** 44:17  
Again, this is, you know, dependent on what the rate design is from a working Group One.  
However, one possible idea would be to create an online portal where bundled none build with customers could view and download specific prices and charges for the bill period, and then for the customer rate change.  
Again, we're not sure how this is a barrier to dynamic pricing enrollment and we have some concerns about.  
The issues that might come up with that, including policy and compliance issues, and there's also a lot of technical requirements that we need to be considered as well.  
Uh, Brendan, do you wanna close this out?  
Sure, I can close this out.  
I don't know.  
We plan.

 **Brandon Sanders** 45:08  
On that.  
So I guess we'll we'll have time for any questions again.  
You know, generally we are on the features we're looking for, more flexible, a little bit more flexibility than it's provided in the energy division proposal and A to kind of summarize our position with CA as we understand that some challenges exist.  
We want to continue to work with the CC's over over those challenges and I think up next is a response or or something added from the CCA talk about this.  
Ohh hey, hey, Leanne, how are you there and here you are.  
I think I think you're up next, OK, alright.

 **Leanne Bober** 45:45  
Right.  
Or do you want to take questions on your on your proposal first or do you want me to?  
I don't know Achintya is in.

 **Brandon Sanders** 45:51  
Charge.  
Whatever Cynthia says, we should do OK?  
Or our our locker either.  
Either one of them will defer to them for sure.

 **Leanne Bober** 45:59  
OK, well I don't.

 **Madduri, Parimalram "Achintya"** 46:01  
See any hands raised or questions in chat, right.  
Oh, never mind.  
I look spoke too soon.

 **Edward Randolph (Guest)** joined the meeting

 **Madduri, Parimalram "Achintya"** 46:07  
Hello.  
Please go ahead.  
Yeah, I wanted to. No.

 **Gupta, Aloke** 46:13  
OK, I wanna do.  
Clarify one part of your slide.  
There was a slide where you discussed a umm some differences with the staff proposal.  
And and I think on the bottom you you summarize sort of four points, uh?  
I think the next slide after right.  
Uh, I think .2 and three uh on the bottom there.

 **Ken Boley** left the meeting

 **Gupta, Aloke** 46:45  
That that's in alignment with the staff proposal.  
So I wouldn't characterize them as differences.  
The staff proposal does talk about transactive as an optional feature, and it also.  
Considers transactions to be the in a LC responsibility.  
So if an LCD not offering it you receive would obviously not be required to operate.  
So.  
So those two points I just want to clarify are in alignment.  
Thank you.

 **Madduri, Parimalram "Achintya"** 47:17  
When Smith, with their hand raised.

 **Collin Smith | Leap (Guest)** 47:26  
Translate from weep.  
I wanted to ask about the last part of the umm uh slides on CCA enablement.  
The question about changing customer rates, I know SDG and E uh, it did not.  
That's like comment on that because they didn't see how it was necessary for the.  
They have agreed structure to succeed, but for PG and E and SCE, I was wondering if you could walk us through sort of once your proposed solutions implemented, what would be the process by which CCA's can I enable customers to switch to alternate rates?  
I can.  
I can respond for SEO, I I don't.

 **Brandon Sanders** 48:08  
I don't think we know yet.  
We know that the statewide tool is one of the requirements for it is to enable third parties to make changes to customer rates.  
We know that we'll have to have a customer authorization for a third party to do that.  
We have.  
We know what what is existing out there today.  
So we know that there's a process to share data with third parties using green button Connect.  
So we can use that as you know, if that works well, we can use it as a model.  
If it doesn't work well, we can learn from it and implement something better, but those discussions have yet to take place, and I think generally for SCE we we also want to learn more from the CCA's about the reasons why a rate change would.  
Why?  
Why CCA would need to change the delivery rate for a customer, and that's a little unclear, at least to us.  
Still, at SCE?  
Why?  
You know, since they have control over a customers rates on the generation side, why they would need to make a change to a customer delivery rate in order to implement demand flexibility.  
We've had some discussion on that in the past and I understand some of it has to do with, you know, how usage is provided in some of the IU service territories.  
But I still think there is hopefully some additional discussions still to come on that I am hi, this is John and I'm.

 **Lin, John** 49:27  
Between me and I'll just chime in also on on that functionality a lot actually all of it is yet to be defined to the statewide working Steve White Tool Working group.  
I I would refer to universal devices and Michelle's earlier comments about multiple systems and authentication and authorization that actually presents a very, very, very complex problem that we will need to tackle in this statewide tool because customers need to authorize.  
I don't think there is any.  
No need space for arguing against that.  
And then for the great changing agent and we have to resolve the issue of well canned more than one agent be able to authorize be authorized for rate change if there's more than one, we're gonna run into problems.  
So all this is TBD, but yes, it is a very complex, complicated complex problem because we have multiple systems that we would need to handle and properly authenticate and authorize.  
Yes.  
Yes, thank you, I agree.  
Thank you.

 **Michel Kohanim** 50:50  
And I I agree with Brandon as well.  
Green button connect the way to go.

 **Madduri, Parimalram "Achintya"** 51:00  
I think we can transition.  
To to the CCA's.  
'S.  
So Leanne, did you wanna go ahead?  
Sure.  
And can I share my screen?

 **Leanne Bober** 51:12  
Is that a yes?  
Please, please go ahead.

 **Madduri, Parimalram "Achintya"** 51:15  
Great.  
Thank you.

 **Leanne Bober** 51:23  
Yeah, that's coming through.  
OK, great.  
OK.  
So yes.  
So thank you very much to the IOU's for your presentation.  
The IOU's have presented the potential barriers that CCC has identified.  
Back in March, and so I won't be going back through what what the iOS have already presented.  
Umm, I wanted to briefly follow up with the CA proposals in light of the IOU proposals and especially highlight where work still needs to be done.  
But before I do that, I we really wanted to 1st express the CC's appreciation for the work that has been done since the C's first presented these barriers for unbundled cuz for CCA, offering their unbundled customers dynamic pricing back in March in each of the IOU territories.  
The IOU proposals in response to the identified barriers reflect the significant time dedicated by both energy division and the IUS to look for solutions, and the CCA is really appreciate it.  
So with that, I will go on to.  
So I'm just going to briefly go through each IRU territory like the IUS did and just highlight a few additional points you could see above instead of on the left hand column like the I used it.  
I've put the identified barriers on the top row, umm.  
And so we'll start with the first PG and E's proposal for their interim upgrade to their EDI system.  
In response to the CCA is identified difficulties accessing or inability to access hourly.  
Umm.  
Interval billing transaction data.

 **Robert Perry** left the meeting

 **Leanne Bober** 53:14  
So the CC's are are appreciative of that proposal.  
Agree with it, but they request that PG and E keeps them apprised of the progress on it, and there's an outstanding question of if P GNU reaches that top threshold of 600,000 saids that they will, that they said that they will have open, will they increase that if the need arises for CCA's?  
For CCA's, so just an outstanding question with respect to the share my data system and access to.  
Uh hourly customer usage data.  
I think this is probably the area where the CC is.  
Disagree the most with the proposal.  
The CC's experience with share my data is that the system has been unreliable with missing and delayed data.  
We appreciate that IUS listening and and trying to, you know, fix specific problems that have been identified and you know, look forward to continuing address these issues in this proceeding.  
And then also in the der proceeding or the Dr Rulemaking where they're going to be addressing larger data access issues for CCA, the CC's have also requested in comments in the working group report A by annual audit of the SMD system just to, you know, continue to dig in and try to figure out why these transmission issues or just system issues continue to occur.  
And and again that data is needed by the CC's for their accurate forecasting, which impacts affordability and also grid reliability.  
So it's important that CC's have the customer usage information that the iused also do, uh.  
So and then the last three.  
Umm, you can see it's all green.  
We're generally in agreement with PG and E access to customer data.  
I'm not sure if if PG and mentioned that the parties had agreed to further discuss this issue in PG and E's to be on response application proceeding.  
A working group is being established to discuss those wider issues.  
Ah, and then with respect to equivalent Bill presentation, the parties agreed to discuss those issues later in the proceeding when the demand flexible rates have been developed and they'll presentation issues begin to be discussed.  
One issue that I won't repeat in each of the territories, but CC's have raised many times that in that build presentation, CCU is will request that their rates are presented rather than an IOU proxy rate.  
Umm.  
With respect to in the demand flexibility context or dynamic pricing context and then finally with CA inability to fulfill customer rate change requests, we do hear that you know maybe characterizing that as a barrier to offering uh dynamic pricing done bundled customers isn't the right characterization.

 **Streib, Tysen** joined the meeting

 **Leanne Bober** 56:37  
The CCA's wanted just simply raise the issue that currently CC's are not able to fulfill customer rate change requests.  
They have to send their customers back to the IAU to do that.  
And so just wanted to highlight the complications with respect to that in with dynamic pricing and acknowledge that like PG and E that that this should be addressed in the CCLS proceeding with the development of the single statewide tool. OK.  
And then in Edison's territory, ah, real quick, the first column there, there isn't the issue.  
Similar issue as in PG need service territory with respect to access to hourly interval billing data, but as SCE noted, the CCA's did express their issues with respect to the access to low latency hourly customer usage data.  
The CC is very much appreciate the edisons development of their snowflake system and appreciate the ongoing support that's being given currently during the and request that that continued during the testing phase and then umm during implementation with respect to access to data on customer enrollment in Dr programs, the CCAS appreciate that Edison has agreed to provide that information in their reporting.  
Umm, the CCA's are.  
Request that they do have a preference that any of that type of information be provided on existing customer lists so that the CC don't have to rely on multiple reports.  
And similar to PG, the PG and E umm issues the CCA's agree to address the bill presentation issues later in the proceeding and to.  
Discuss the customer right change requests in development of the single statewide tool and then finally an SDG needs territory with respect to access to low latency.  
Early customer usage data.  
The CC is very much appreciate.  
SG need building their technical solution to provide the interval or the hourly customer usage data.  
CS Look forward to that implementation and request regular updates from SDG and E as that moves forward.  
With respect to access to data on customer enrollment in Dr programs, there is a bit of a disagreement there.  
SGD claims that already provides CCA with customer information on ELRC and critical pricing default enrollment.  
However, the CC's are the GDC's are are looking to receive identifiers for all Dr programs that customers are enrolled in via the weekly snapshot.  
Umm.  
With respect to Bill presentation, uh, the CCA's are again agreed to, you know, discuss that later in the proceeding as a bill presentation and build presentation issues are addressed.  
But SGD also proposed an online portal for customers to view price specific prices and charges, and offered to include unbundled customers or CCAS in that system.  
And the CCP's commented that they're amenable to participating in that subject to further discussions on on costs for that system.  
And then finally on the issue of CCA inability to fulfill customer rate change requests, and as you heard, SGD has concerns regarding those CC ICA identified issues.  
I think we feel like the issue has been misrepresented a little bit.  
C's are not requesting that they be enabled to change customer rates and bypass SDG's role as a billing agent.  
Instead, it's just raising the issue again that it's a complicated issue.  
Umm.  
Regarding future customer rate changes, when?  
The dynamic rates go into effect and it's something we're gonna need to discuss here and in the CCLS proceeding, and that's all I have.  
Does anyone have any questions?

 **Madduri, Parimalram "Achintya"** 1:01:29  
Uh, I don't see any questions in chat and I don't see anybody with their hand raised either.

 **kay aikin (Guest)** left the meeting

 **Madduri, Parimalram "Achintya"** 1:01:38  
OK, perfect.

 **Leanne Bober** 1:01:41  
Thank you very much.  
OK so.

 **Madduri, Parimalram "Achintya"** 1:01:46  
I think that's, uh, the end of the the IIUC presentation, and then we have one last umm presentation from uh from third parties.  
So this is the third parties proposal for proposal for enabling third party participation.

 **Elizabeth Reid** 1:02:10  
So we're like the we're the last presentation.  
So I'm sure everybody's really anxious to get through this.  
We didn't have one question.

 **Madduri, Parimalram "Achintya"** 1:02:16  
That we wanted to tackle at the end, so not everyone gets everywhere.

 **Elizabeth Reid** 1:02:21  
So people want to get to that.  
Can you see my screen?  
Yes.  
Perfect.  
So first of all is I think people have actually even noted in a lot of that the comments is third party is a really broad term and we've had that some of the discussions in the working group.  
So I won't repeat them, but one of the things that we struggled with is really getting all the third parties involved and what the different categories are.  
Third parties are, so I wanna make sure that just to frame this for people as we're going through this is these are the different categories we used that were being used in the proceeding for looking at third parties.  
And they're quite it's quite broad.  
There were a lot of different different specific needs from each of the entities, as well as each of the categories.  
I think one of the things that I think I should have known, but that I learned throughout, that the initial efforts was how broad it was and how there was you combine that with business model changes and different third parties who might be sitting in one category now might sit in another later or might cross several categories.  
And So what that tended to do was keep the discussion up.  
We dive into to details.  
We keep the discussion up pretty high.  
In the end, there were three of us who authored the proposal, and that's Michelle from Universal devices, David Myers from Polaris and Grid Tractor and myself.  
Unfortunately, David wasn't able to be here.  
But Michelle is also on the line.  
And So what I wanted to do is give you a bit of a summary of the things that we are proposing in the adjustments that we are trying to make to the proposal a bit to make sure that it meets all the needs.  
Umm.  
First of all, this is summary of the guidelines that I think we're, you know, I I think somebody pointed out in one of the comments that it's not necessarily a consensus for everybody.  
And I think that's true.  
That's my point.  
But we did come up with these five items that I think the majority of the people who were involved in the discussions did agree with, and this was in the proposal and I would lay this as guidelines and not proposed items because these are the guidelines that the third parties were proposing that some of these other things as they come together would need to be factored in.  
I think people have seen most of this before, but a couple of key items to just bring to your attention is really the the idea for the customers to have access to their prices.  
Since we've touched upon a lot of these points already today.  
The fact that we do believe that much of the technology is all that's needed is already operational now, that's different than from the infrastructure.  
But the technology itself is already operational.  
And that we do think that there is assistance needed for just in disadvantaged situations.  
I the key thing throughout a lot of the discussions and in our proposal is the idea of leveraging, leveraging, sorry as many systems and capabilities that are already in place, transitioning to new revenue streams, new business models, there's a lot of costs involved in all this and obviously a lot of time involved before the infrastructure can fully be put in place.  
And so the more that we can leverage that we already have built, the quicker things will go and the lower the cost will be.  
This is a slide that it we've used.  
It's been updated a bit, but we've used it in some other presentations to try to identify the the business operation area, the critical need and then the key elements that were proposed.  
And I'll just quickly go through this and then dive into a couple of items a little bit more thoroughly.  
We have removed a couple things in here thinking about them as being encompassed under other issues.  
We really think that streamlining the custom authorization process through green button, that there really needs to be, you know, some focus on green button and how we can streamline that if we're really looking at customer acquisition.  
And I think that echoes a lot of other comments that have been made today and in other meetings.  
And we think that there should be some review of Rule 24 and Rule 32 to make sure that they're it.  
It's widespread.  
It covers the whole ecosystem and it's not so DRP focused as we're kind of moving along in the evolution of this market that we should be allowing options maybe in a an ASP or something for QR codes for authorization that the more sophisticated we can get and the more we can allow these simplified versions, the better off we're gonna be.

 **Alison LaBonte (she/her)** left the meeting

 **Elizabeth Reid** 1:07:02  
Umm, we really do want to look at technical incentives as well.  
So I'm gonna kind of skip down in a couple of these is really thinking about how can we provide technical incentives to the right people and we have a little bit more discussion about that and the next couple of slides.  
We've also kept with the idea that there should be some RFP's for infrastructure, and I know there was some comments about like well specifically for what pieces of the infrastructure.  
And I think it was very hard to really say this specific thing, but we're talking about all these different systems and machines that we're talking about putting in place is that when wherever possible for that infrastructure, we think it would be important to have RFPs to get different players involved to get the lowest cost provider.  
And so this was more of a generic statement than a statement about a specific thing.  
It was more that wherever we can, we think it would be really important to have our RFP's in place, that there are have comparative models.  
Umm, I think that one other thing that we put down here under the revenue and settlements is there's a lot of issues about privacy which we completely understand.  
I think every party is concerned about that, but that we do think that there should be some level of evaluation and maybe that device data can be anonymized and there could be some requirement to provide that data for evaluation purposes in the first few years.  
Now if I move to the next slide, which would be helpful if I could.  
Umm, these are just some things that we covered before but have adjusted a little bit, updated our proposal to try to make sure that it makes more sense for everybody involved, so that the statement that we had made in a previous and in the original proposal, I should say is that device manufacturers would have some limitations on their ability to qualify for technical incentive funds unless they provide reasonable access to other third parties that did not.

 **Willie Calvin** joined the meeting

 **Alex Colteryahn** left the meeting

 **Elizabeth Reid** 1:08:59  
Just to be clear, that did not mean it's solely based on this, and I think the question is what's reasonable access.  
So we tried to split this up a bit in explain, this a little bit more, maybe make this a little bit clearer is we're not expecting that technology providers are device manufacturers should be forced to provide access to all third parties.

 **Streib, Tysen** left the meeting

 **Elizabeth Reid** 1:09:21  
What do you think setting standards for access is is valuable and important, and that customer incentives could be linked to some to the providers being able to do those things.  
We also think that technology providers, which really are the largest third party segment when we went back to the segmentations of the different types of people, different third parties within the ecosystem, device providers, technology and device providers are really the largest segment.  
And so we think there should be some acknowledgement about the cost of integrating all this functionality into their devices and a structure to provide incentives to encourage them.  
Now we didn't get very specific about exactly what that structure should be.  
There was just an awful lot of unknowns here about what business models are gonna look like and exactly how some things are gonna play out.  
But we did feel pretty strongly that there needs to be some incentive for the device providers to be in integrating this functionality or the ecosystem does not work.  
We move on to the next slide.  
Here we're talking about the specific rate info, which we had a discussion about.  
Well, we touched upon it a little bit earlier in the day and the customers would need to have ability to access this information themselves, even though providers may be providing other types of visualization capabilities, incorporating other things into their offering.  
We wanna make sure that customers have access to the data and I think that's been is not been pretty well discussed.  
Again, the expansion of Rule 24 or 32 and the ability for consumers for their account for acquiring consumers, it should say, is their option to pay the lower a fixed tariff or a dynamic price during the transitional period.  
We had a couple of specific working group recommendations because I think somebody said earlier today and I'm sorry, I don't remember who it was, but I wrote it down was that we're all really trying to figure this out.  
This is new to a lot of people and I think it was in the context of some of the IUS discussions for working Group One, but I think it's true across the ecosystem and certainly for all the third parties is that we're really trying to figure out what's going to happen, what is gonna be provided.  
What does that mean for different people's business models?  
What do we think should happen?  
And so we were suggesting that there be a working group to figure out the feasibility of an open source device integration platform.

 **Heather Y Mo** left the meeting

 **Elizabeth Reid** 1:11:45  
I think this means that you know that we're not trying to make make different manufacturers comply.  
What can we do here?  
Have them involved in that discussion.  
We also would recommend that there's a working group to figure out existing technology to take the previous slide where we're suggesting that we should leverage as much existing technology as possible.  
Then they'll probably needs to be a lot more deep dive into.  
What does that really mean?  
The specific areas we have spelled out there and we were specifically asking for Midas to support open aid.  
Yeah.  
3.0, We definitely think there should be a field pilot to determine the best approach for ensuring low income and disadvantaged customers.  
Additional technology incentives for that population, but the specific technology for the field pilot.  
We think that a lot of different types of technologies should be considered to find what's the most cost effective and the best reach.  
And then of course, last but not least, customer education and awareness.  
So that's a a summary of the the proposal that we had provided and I recognize it's a bit high level.  
I think it's it's not quite guidelines, but I think it's more about intent and it dovetails with a lot of the discussion that we've had today.

 **Lee Ewing (CPower)** left the meeting

 **Elizabeth Reid** 1:13:00  
So wanted to pause a bit there and see if there are thoughts, comments, questions.  
Thank you, Beth.

 **Madduri, Parimalram "Achintya"** 1:13:10  
I I did have a quick question or or we're gonna do understand something the this open source device integration platform.  
I'm not sure I fully understand where that sits and uh, how that would be in relation to the proposals that were in the report.  
Yeah.  
Which were from a price portal perspective, suggesting that the Midas platform would, you know, the Midas server would be the price portal.

 **Lee Ewing (CPower)** joined the meeting

 **Madduri, Parimalram "Achintya"** 1:13:42  
I don't think this is about replacing the money.

 **Elizabeth Reid** 1:13:43  
Yes, Sir, I know it's not.  
Shouldn't I?  
Don't think it's OK.  
It's not about replacing the minus server.  
This is about the concept of how can we deal with some of these other issues like for the customer data for subscription services, some other data from device platforms that we talked previously about having some kind of centralized system for that and the more open source we can do, the better off.  
And I think that, Michelle, you might wanna add some comments cuz I know this is something that you had really wanted to add in here.  
But I think the idea is is how can we develop things that provide as much access as is reasonably possible without hindering or or, you know, putting 22 too many?  
We don't wanna put device manufacturers in it in a vice lock.  
We don't wanna put different people in advice like how can we provide as much access as possible and allow different third parties to transition and develop new business models.

 **Foudeh, Masoud** left the meeting

 **Elizabeth Reid** 1:14:38  
Because I think that's inevitable.  
Yeah, exactly right and.

 **Michel Kohanim** 1:14:42  
I think I just wanted to make an example of Sep which was supposed to communicate with all devices everywhere and it never happens.  
So the question is, how can we have an open source platform or anything that allows existing devices to all to also be part of this dynamic dynamic price feature?  
Write something that the mouse communication with things that already exist removes the manufacturers from having to support something specifically and just opens up the future for any type of integration and any changes to the platform or prices.  
Yes, and Michelle, it's fair to say too, I think that.

 **Elizabeth Reid** 1:15:23  
This proposal is not, it must be done that way.  
It's that we think it should be investigated.  
Exactly, it shouldn't be.

 **Michel Kohanim** 1:15:31  
Nobody should.  
We're not suggesting we should be money set aside for.

 **Elizabeth Reid** 1:15:34  
Because there's all sorts of obstacles to this.  
Yeah.  
What we think is that there are so many obstacles in this area, we should at least maybe have a group looking at it exactly precisely.

 **Michel Kohanim** 1:15:45  
Really.  
But I guess to sort of maybe drill.

 **Madduri, Parimalram "Achintya"** 1:15:48  
Down a little bit, it seems like it falls outside the taxonomy of systems and processes that we've been discussing.

 **Andrea Leon-Grossmann** left the meeting

 **Madduri, Parimalram "Achintya"** 1:15:56  
It's not something that I would classify as necessarily part of the price portal or the price machine.  
It seems to be, I think that's totally fair.  
Yeah, I think that's fair.  
True.  
OK.  
Yeah.  
Thank you.  
Yeah, I think it's a fair point.

 **Elizabeth Reid** 1:16:15  
Alok.  
Yeah, I don't a different question on a different slide.

 **Gupta, Aloke** 1:16:20  
There was a slide where you were describing that incentive structures.  
Could you go to that slide?

 **Foudeh, Masoud** joined the meeting

 **Gupta, Aloke** 1:16:29  
It which one is this one?

 **Elizabeth Reid** 1:16:31  
Well, no, I think it's the one after that.

 **Gupta, Aloke** 1:16:34  
That one.  
So the last bullet point, the shipping provided incentives to integrate functionality into the devices.  
Ohh OK so this is just a AA1 time thing as far as accommodating and dynamic rate.  
So what was there any thought about the A a compensation structure that would be sort of an ongoing basis, the device manufacturers mean?

 **Elizabeth Reid** 1:17:08  
Well, no to to to to.

 **Gupta, Aloke** 1:17:09  
To navigate around, whether it's a device, device, aggregator or a third party aggregator.  
Ohh yeah so this this.

 **Elizabeth Reid** 1:17:16  
Specific bullet is about the device manufacturers you know to recognize that the functionality needs to be in the in the actual technology, which I don't think initially like you know this has evolved over a period of time and certainly a lot since August and thinking about the device manufacturers and how they fit in and how everybody fits in there for the aggregators, Umm and Michelle, please jump if you see it differently.  
But I think there was two and I've had various discussions with people.  
There were sort of two prongs that I think attacked your question log.  
So one was not an ongoing stream, one was the idea of initial incentives.  
So it was kind of comparable to this to allow for business model transitions.  
So that was one stream of discussion.  
And then there was a discussion about about really how could we avoid incentives but actually look at the business models cause I think the real the the thing that has several people have commented on and certainly I feel this way is in the last four months maybe I think the business model instead of getting clearer has gotten in some ways less clear.  
I think the technology needed has become clearer and the specifics things data that's needed.  
It's starting to really come together, but the what does that mean for some of the third parties is still pretty unknown.  
And so I think that there's this question about how much help should be given to transition business models across and whether that should be a one time only thing.

 **Matthew Rutherford (he/him) (Guest)** left the meeting

 **Elizabeth Reid** 1:18:54  
The way in many of the groups that I was with and the way we talked about it in the way I sort of see it is I'm not a big fan of ongoing incentives.  
Personally, I think things have to stand in its own business.  
Models have to change.  
You can do something to to shift over the you know over the gap.  
And so there could be some incentives for things like becoming a provider, actually integrating with minus, you know, there could be some incentives that help defray certain things.  
But then ongoing, it should really be about the model, the business model, and that there's a model for people to be able to make money where they have to shift to a different model.  
They're, you know, they might.  
It might not be the current model, right?  
But they have to shift to a business model that there has to be something that works or they have to get out of the business, but that transitioning from A to B might need a little bit of incentives, right. So.

 **Gupta, Aloke** 1:19:49  
So I think to to confirm then the business model related umm, monetization or or incentive, those were discussion items, they didn't, they didn't advance prior enough to get into a proposal.  
I think that's true.  
I mean, I think there's a couple things I.

 **Elizabeth Reid** 1:20:06  
But I think the the the the issue was that and I'll tell you we have big discussion in a couple of us had a discussion last week about the idea that maybe we should continue the discussions about the business model.  
You know, regardless and be thinking about, you know, maybe there's a white paper about what those different business models could be as certain things got a little clearer.  
But I think it kind of comes back to this issue here, which is that third parties, you're a big you know it's a big broad spectrum and historically and initially when we started this a lot of the people involved were aggregators and then it comes spread out a little bit.  
And so I think that there is that switch to business model like several people are like it depends on how this specific thing shakes out.

 **Mann, Ryan (Enel North America - USA)** left the meeting

 **Elizabeth Reid** 1:20:58  
You know how the price, price amount is gonna work?  
How the portal's gonna work exactly how they could do it.  
But at least people I don't wanna speak for everybody but the most of the third parties that I've talked, just particularly on the aggregator side are all starting to think about how can I change my business model and shared services was the one that came up in the most conversation.

 **Leanne Bober** left the meeting

 **Elizabeth Reid** 1:21:20  
You know that.  
But but to actually say this is exactly what we want that to look like was a little bit was it felt a little premature and it wasn't there wasn't consensus.  
Thank you.

 **Madduri, Parimalram "Achintya"** 1:21:41  
The questions.  
Here so I think I think we're good.  
Yeah, we could move on.  
So thank you so much, Beth and Michelle for and and and David David Myers for Polaris, for putting this together, happy to do so.  
OK.  
And so I think we had, you know one one question before we sort of go to closing thoughts there, there was a question that we had put a pin in.

 **Schenck, Lauren** left the meeting

 **Madduri, Parimalram "Achintya"** 1:22:15  
I'm gonna try to find the exact question in chat.  
Thank you again for coming on and maybe Ruben, if you wanted to as well.

 **Stephen Campbell** left the meeting

 **Madduri, Parimalram "Achintya"** 1:22:28  
To the transmission pricing.  
Apologies, I'm trying to find that message.  
I think it was the timing of trans.

 **Reuben Behlihomji** 1:22:37  
His mission?  
Yes. Proven.  
Yeah, I.  
So the specific question.

 **Madduri, Parimalram "Achintya"** 1:22:41  
From Tom Beach, which was referenced by Claire Broom, was can Tyus provide their specific furk rate change schedules and commit to time frames for reforming their for transmission rates to make them time dependent and based on marginal transmission costs.  
The CPU C has been encouraging this at least since the TEF decision in 2018, and the IUS have been slow.  
Walking rate design changes to their transmission rate for years.

 **Reuben Behlihomji** 1:23:07  
Persiana, do you want me to go?  
I can go because I.

 **Grygier, Jan** 1:23:11  
Have that famous Gantt chart, umm, show so OK and you can you can figure out what to do later.  
OK, so let me try sharing it.  
You know we are.  
OK.  
Can folks see that?  
Yes, we can see.  
Yes, OK, alright.  
So the bottom part of it relates to BJ's application deferred for a for a tough time varying transmission rate.  
And I'll just show this briefly because it's actually a more detailed explanation of this up further.  
This is all in our LMS a compliance report.  
Uh, which is filed?  
I don't know.  
We could do ago umm, but essentially at the high level we start studying and modeling.

 **Mark S Martinez** left the meeting

 **Grygier, Jan** 1:24:06  
Umm you've transmission rates?  
In I don't know about nine months or something third quarter of 12 months in in 2023 we just filed, I think maybe a week ago.  
A Ato application?  
Umm, which actually had slightly lower rates, which is good news but but anyway we couldn't get anything done before that one, but we'll start studying it.

 **Ashkan Rahimi Kian** joined the meeting

 **Grygier, Jan** 1:24:38  
It takes about a year and I'll like I said, there's more details and the other thing we do want to engage with other stakeholders and coordinate with the other.  
I use because the transmission system does have certainly connections across IU's and across service territories and so on.  
And then we would right and submit an application to fork.  
And now we're talking 2026.  
Umm.  
And then everything happens at once.  
You have church approval, tier one advice letter to the CUC and implement in rates.  
And as I mentioned earlier, this would initially being shadow build rates not in our billing system.  
And the reason we could do that so fast is that we had already configured the update ahead of time.  
So we're not gonna wait for everybody to say yes before we start working on on the tool.  
And so I do.  
I'll.  
I'll just move up to the detail thing.  
She is on page 12. That is.  
Yeah, it's a fun diagram with transmission system.  
Uh, here we go so.  
So that first thing about, Umm studying is is actually spelled out in sort of these three parts here.  
So I would start off by I'm gathering study of requirements talk, talking the CAISO and transmission planners of which are not one, umm, gather for the data and then start developing cost allocation models.  
Uh.  
Then we work with other IU and even your groups.  
And so on.  
Umm.  
And settle on the proposed rate design.  
I suppose it for FERC.  
Umm it says 4 implementation by January 1.  
So one of the wrinkles here is that I forget how many days, but there's some limit on at first that you can't propose.  
You can't file an application more than some number of months before it's going to be implemented.  
I forget, I'm afraid.  
What that is, but it was not a really long time.  
So we couldn't, like propose something way back here and then have it implemented in 2027.  
We have to actually wait a while.  
Umm.  
And then the CUC of course has to weigh in on it, so there's definitely timing issue, but anyway, and then we'd file the advice letter umm and actually implement at the end of 2026.  
So that is our plan.  
Now, as I mentioned in our warning presentation, this is assuming that all the stars align.  
And there are a few stars here.  
The biggest ones being 30 and that's the beauty.  
So yeah, this is like a best case.  
Flat.  
But that's that's what we're aiming for.  
Any questions on this before we go to Ruben?  
Umm.  
And Gene actually still here after all this.  
I hope they can always pick it up off the transcript and so on.  
Yeah.

 **Madduri, Parimalram "Achintya"** 1:28:15  
I don't know if Tom and Claire are still here, but umm, I don't see any any follow-ups.  
I do.  
I spoke to sohh.  
I see Tom.  
There you are, OK.

 **Grygier, Jan** 1:28:26  
Yeah.  
Can you hear me?

 **Tom Beach (Guest)** 1:28:27  
Yes. Yeah.  
So I mean, I just clarify, it looks like this schedule is based on assuming you wouldn't do it that that you're just barely gonna meet the deadline of 1127.

 **Alice Kilduff** left the meeting

 **Tom Beach (Guest)** 1:28:40  
So you're not.  
This is not a schedule to have time dependent FERC transmission rates in place well before that deadline.  
Correct there.  
There are so many other things.

 **Grygier, Jan** 1:28:52  
Happening, to be honest, Tom, that yeah, we're not trying to put this.  
I'm it in in line earlier than that and part of the reason for that I appreciate and I remember that you that sea you, you ticular.  
But ask you for this for a long time, but I would say that part of the reason for this is because it is a much smaller signal on average than the Gen signal.  
That same goes with distribution.  
Umm.  
And we kind of know how to do the Gen signal and we're not sure how to do the transmission signal.  
So, you know both of those things I or factors in in this thing are coming later to the party than some of the other ones.  
OK.  
Thank you.  
Yeah.  
OK. Thanks.  
OK.  
Anyone else?  
Otherwise, we can go to Ruben.

 **Reuben Behlihomji** 1:29:54  
Young, can you do me a favor and go back to you?  
Your chart so I can at least use that as a reference as I'm talking to.

 **Buch, Daniel** left the meeting

 **Reuben Behlihomji** 1:30:00  
Yep.  
Thank you.  
QR.

 **Grygier, Jan** 1:30:06  
Thank you.  
Yes, yes.  
So SISS.

 **Reuben Behlihomji** 1:30:09  
Two is probably going to umm I have to file a separate rate applications to the way we're thinking about this is we get a Commission CPC guidance somewhere in Q1 of 2024 will be about the same time when we file our phase two of the GRO.

 **Kasman, Robert** left the meeting

 **Reuben Behlihomji** 1:30:30  
So right now we're in the process of the analytics and review needed for filing SCD space of the GRC that's expected in in March of 2024.  
And about the same time was when we'll get Commission guidance in the DFYR some starting March of 2024 as we roll off the face to finally we immediately jump into preparing for a rate application on dynamic rates to be filed at the CDC.  
We think that's gonna take us about 8 to 12 months to actually go through the process of all the studies and like the analysis, hopefully by then we get more insight through the pilots that we are run through executing along the way as we do that.  
And then make an actual application and then see if you see sometime in January you have 2025.  
So we're thinking that we can we file our you know our TLS compliant RT related sometime in January of 2025 at the PUC and like the one mentioned, we cannot really file it the 1st until six months when we think we're going to be able to implement for grades.  
And so the timing of the firing, if I think about the math of implementation, let's say you're either you're looking at 18 months implementation after you receive CPC approval, assuming in 18 months litigation timeline in the CPC proceedings.  
Well, that's about 36 months.  
So 30 months from Jan 2025 brings us somewhere around the first quarter of 2028 when you'll be able to make that that actual filing at the FERC for for implementation of work rates.  
Now this is all this is all subject to, you know, the the March 2024 guidance that we received from the Commission getting all of our rate designs done for dynamic rates within 8 to 12 months, hopefully cross fingers.  
We get that done and as young sometimes described as the stars aligned.  
Then if we have.  
A quick process of review through the CPU C process.  
If we find in Jan 252025 we're expecting hopefully some decision by July of 2026 and then it's just implementation after them.  
So between July of 2026 through, you know, John of 2027, we should, we should be in the process of doing system enhancements to implement these rates.  
And then depending on the the timing of when that implementation look include, which for discussion purposes we are holding up 18 months, six months from that timeline, we'll need to file something at the first.  
So we're we're bound in that July 2026 through.  
And remember Ruben, it's two years.

 **Brian Alward** left the meeting

 **Eva Molnar** 1:33:35  
For this, because of the real time, the implementation is 2 years.  
Yeah, for this one.  
So it's it, it's it's.

 **Reuben Behlihomji** 1:33:47  
It's because because we are not, we're not gonna be able to fold this into our you or say we we know that we are.  
We're trying our best, but will most likely need an extension on the CC side.

 **Kimaya Abreu, Voltus** left the meeting

 **Reuben Behlihomji** 1:34:00  
Ruben.  
I'm.  
I'm sorry, maybe I missed this.

 **Madduri, Parimalram "Achintya"** 1:34:01  
Stood.  
But is there a reason why UMSE couldn't do a concurrent process like it seems that PG and E is I'm planning on here it it appears that PG and E is planning on a concurrent process where at least they sort of start doing some studies.  
Stakeholder engagement and then, you know, have an application.

 **Tom Beach (Guest)** left the meeting

 **Madduri, Parimalram "Achintya"** 1:34:26  
Uh, I, you know, in place, I sort of to be approved.  
Yeah.  
And and ready by by whatever the the the rates the the LMS compliant rates would be made available.  
So but it, but it sounded to me like what you were suggesting, you know, put put the FARC process as a dependency.  
Because we're the way we're doing it, I shouldn't here is that.

 **Reuben Behlihomji** 1:34:54  
A lot of the studies that studies and stakeholder inputs process that big needs describing here is also rolling into our application processes CPC.  
So at the CPU when we're we're in flight in that rate design analysis mode targeting a Jan 2025 application at the CUC real be in parallel.

 **Mitch Sears** left the meeting

 **Reuben Behlihomji** 1:35:19  
Also discussing performance, which will be included also in our CUC filing and that the timing of the doing the single issue tool 5 but then taking all that same information that we've now read it through and received UC process and filing that at the first the timing of that single issue 205 is just being done six months subject to check.

 **Wang, Stephanie** joined the meeting

 **Dwight Phelps** left the meeting

 **Reuben Behlihomji** 1:35:45  
I'll check what that real time line is, but six months from when we think we can implement those words.  
So in essence, like you were saying, if the application goes, let's say we get a Commission decision on the application in July of 2026 and it's two years to do system enhancements.

 **Barr, Amy** left the meeting

 **Reuben Behlihomji** 1:36:03  
So we think we're going to implement in July of 2028, then we most likely assuming six months is the right number then Jan of 2028 when this when you'll do the first filing that they'll take all of the information that we have from the CBC filing and present that as a single issue Tool 5 filing for.  
OK.

 **Madduri, Parimalram "Achintya"** 1:36:27  
All the process will happen.

 **Reuben Behlihomji** 1:36:29  
Will happen concurrently with our preparation in the CPU C rate application also.

 **Madduri, Parimalram "Achintya"** 1:36:38  
Thank you.  
I I see that uh Samuel Golding has has a scandal.  
I saw you.  
It's. Hello.  
Oops, there we go.  
Can you hear me?

 **Samuel Golding** 1:36:54  
Yes, Sir.  
OK.  
OK, great.  
Sorry, I have a few questions.  
One of the first is am I understanding this correctly that Edison and PG are kind of approaching this in in like PGP is going to kind of go off and study this and then, uh, seek CPC approval and then fork approval, is that correct?  
Seek FERC approval and then bring it to the CPU Z.

 **Stephen Gunther** 1:37:32  
Is that is that a question, Samuel?

 **Reuben Behlihomji** 1:37:34  
Question.  
OK.  
For SCE, for we're going to go to the CPU, C and then first, and then file whatever we learned through that process and the stakeholder inputs we receive will then be filed at the perk, and for PG and E.

 **Samuel Golding** 1:37:53  
Uh, where did it?  
Sorry.

 **Stephen Gunther** 1:37:57  
OK.

 **Grygier, Jan** 1:37:59  
Not sure who's in the background and I I I didn't write this part, but I believe that we're going the other way around.  
So we would, we're aiming for FERC first and the CPU C second great.  
So I just want.  
Yeah.  
I just wanted the other difference is a little discussion around it, yeah.

 **Samuel Golding** 1:38:21  
So I I just want to mention while I'm I've got.

 **Grygier, Jan** 1:38:23  
Stick that it.  
The other difference is that we're we're not gonna have our billing system ready for RTP rates in in 2027 anyway.  
So everything is gonna be shadow build and that means that there's less development time for us.  
So we won't have rates in our building system until I don't know 20282029 or something but the but in shadow builds we can do it quicker.  
OK, go ahead.  
Get another follow up question, Sam.  
Well, maybe, yeah, I mean it.

 **Samuel Golding** 1:39:04  
It seems that I don't know.  
Maybe the CPC would want to offer a little bit of guidance for how to structure and unify this process across the major investor and utilities. Umm.  
An observation surely wants to chime in.  
Uh, yes, we will be.

 **Woo, shirley (law)** 1:39:24  
Doing the studies in consulting with interested parties about the studies before we take them to FERC now, that is the process that we are going to use.  
Uh, I think Edison will be taking the studies into a CUC case first, but we will be consulting with people before we take them to FERC and hopefully everyone will understand and be able to be efficient in the ferk process.  
I will also remind people that this is all meant to dovetail with how the September 2024 PG and E RTP.  
It's a GRC 2 case.  
We'll have RTP presentations which are compliant with LMS and that case is probably gonna take a while to get decided.

 **Lucas Utouh** left the meeting

 **Woo, shirley (law)** 1:40:21  
And then after that, we'll take at least 12 months to implement.  
So we're managing this process to try to bring everything together at the same time.  
We don't.  
So we're filling our next year Jersey to in September and yeah, but a year from now and we will not have the transmission studies done by them.  
Well, and also part.  
This is GAIL and also.

 **Slocum, Gail (LAW)** 1:40:49  
Part of what's going on here is that the Commission long ago made a decision to stagger when GRC twos are, and the Commission has no authority to tell Furk when it's going to be conducting its TOS.

 **June Bote** joined the meeting

 **Slocum, Gail (LAW)** 1:41:02  
So there's there's although your question and not ideal sounds, Gee, why not?

 **June Bote** joined the meeting

 **Slocum, Gail (LAW)** 1:41:08  
You know there's layers and layers of ossified scheduling that line up differently for the different IOU.  
So if the Commission wanted to try to do all that, that would be a whole nother proceeding just to figure out how to re rationalize everything else.

 **June Bote** left the meeting

 **Slocum, Gail (LAW)** 1:41:25  
I think it's probably better to figure out how can we get from here to there, even if there are some differences between the timing of the different IOU's.

 **June Bote** joined the meeting

 **Samuel Golding** 1:41:39  
Umm.

 **Madduri, Parimalram "Achintya"** 1:41:48  
Sounds like at least energy division may want to follow up and with with with PG and E and SCE to understand uh why the different approaches are being.  
Uh pursued.  
Or why they're there does seem to be some slightly different approach that the the two major 2, the major utilities are taking.  
So we'll follow up on that, but thank you for for raising this, Sam.

 **Grygier, Jan** 1:42:24  
You, Sam.

 **Madduri, Parimalram "Achintya"** 1:42:29  
Claire Broom from 350 barium.

 **Claire Broome 350 Bay Area (Guest)** 1:42:38  
Thanks for for this discussion and I I look forward to the to the follow up and I definitely hope that energy division will take an active role in in that since it is important for their proposal.  
Umm, I wanted to raise a somewhat different question and this may just be a clarification that someone can help me with the IOU proposal.  
Had an intermediate one of the IOU proposals had an intermediate category of dynamic rates in which there would be the opportunity to modify critical peak pricing or consider other ways in which one could accelerate demand flexibility.

 **Larry FEA** left the meeting

 **Claire Broome 350 Bay Area (Guest)** 1:43:31  
Potential.  
Umm.  
And I'm curious as to.  
Is that happening?  
What's the time frame for it?  
You know, obviously fully supportive of real time pricing, but also feel there's some urgency to optimize demand flexibility in the system for all of our benefit.

 **Stein, Jeff** joined the meeting

 **Grygier, Jan** 1:44:00  
Thank you, Claire, for that question.  
In terms of PG and E, some of that will depend on uh, what the decision is in.  
In this case, Umm and the DFOR, but essentially we'd be looking to make any such changes in our GRC 2, which is surely mentioned.  
It will will be filing in September.  
So you've you've heard me say many times that.  
I I think that shorter time Windows make more sense.  
Umm.  
And you know, the various other tweaks that one could make to the the demand flags rate, the other demand flags rate.  
So, but essentially, that's where we would be making those proposals is in our GRC and of course the other I users we've heard have other have their docs in different timing may have to do an RDW and so on, but that's that's PG and E situation.

 **Stein, Jeff** left the meeting

 **Reuben Behlihomji** 1:45:25  
At Ruben, did you wanna?

 **Madduri, Parimalram "Achintya"** 1:45:27  
No, no, I think I think.

 **Reuben Behlihomji** 1:45:28  
I think it will.  
It would be of merit for us to put our heads together and figure out what the best way to do this is as well.

 **Ainspan, Malcolm** left the meeting

 **Reuben Behlihomji** 1:45:36  
It shouldn't be.  
I think you know we are all.  
We're both weeping, SCE and G is coming in with our perspectives.  
Unlock meeting works for us, but I didn't see you guys can give a also be helpful.

 **Madduri, Parimalram "Achintya"** 1:45:56  
Thank you, noted.  
UM, well, I think that that brings us to the end of all the items on our agenda for today.  
Ohh I see a hand raised.  
Sam Goulding.  
Yeah.  
I I just wanted to flag one.

 **Samuel Golding** 1:46:17  
Something about our UM, you can't comments on the working group proposals and it it relates to transmission pricing.  
Umm, I think just high level, we're a bit concerned that of the notion that you would have to go back to FERC every time you wanted to modify transmission rates to retail customers and that you know, particularly in the context of experimenting and refining with real time pricing as the years play out and you know that seems bureaucratically inefficient.  
So if we can avoid it, we should.  
And so in in our comments on the draft working group report, we we point out a few kind of instances or case studies where it seems that states have been provided a little bit more flexibility.  
To change how retail rates for transmission are charged to customers, umm, one of them in particular in in Massachusetts, the the regulators out there, the Department of Public Utilities.  
Directed a utility to.  
Umm.  
Expand a a form of dynamic price allocation for transmission.  
I took to the largest customers, so the the largest customers were to be offered the ability to be charged.

 **Eva Molnar** left the meeting

 **Samuel Golding** 1:47:49  
They could opt in to a transmission rate that allocate, charge them the entire monthly transmission costs based on their, umm, coincident peak demand.  
So the the 12 CP methodology that I believe the California utilities used to allocate transmission costs between customer classes and their formula rate, it's the same thing on the East Coast and New England, but there are instances where that pricing that 12 CP pricing gets passed down to retail customers, umm.  
And that's also we we give another example of the of a cooperative New Hampshire Electric cooperative that's been experimenting with taking that 12 CP pricing lol and trying to predict when the monthly peak is and then charging customers for transmission based on those hours.  
So they wind up with four or, you know, four to six very high priced hours in a month and that's the transmission price signal that dynamic transmission price signal and it's the third example is, is that we point to Pennsylvania down in PJM.  
This seems to also there's some flexibility here.  
Where?  
UM, unregulated entities?  
Well, I should say from the equivalent of ASCO is out there competitive suppliers, they're actually assigned transmission and and they have to pay for transmission revenue requirements.  
But how they charge their customers for that is is completely it's up to them.  
So it's it's kind of like the ultimate flexibility of retransmission retail rates is occurring in Pennsylvania.  
It's probably other places.

 **Eric Woychik** left the meeting

 **Samuel Golding** 1:49:42  
Umm.  
Anyways, if there's, if there's a way to I.  
I kind of wanted to lay all that out to just let everyone know about that.  
Umm, but I I'm curious if the utilities have thought about ways to propose uh and their applications to FERC mechanisms that would allow flexibility in terms of how transmission is charged customers, right?  
It can be an opt in rate and that rate design be modified while still maintaining revenue requirements.  
Any any thoughts there?  
So this is Shirley Wu and I'm.

 **Woo, shirley (law)** 1:50:24  
Good to say that the California transmission system, especially the one through our area, is used for a lot of different purposes and is very complicated.  
Actually, it's import to California export from California, import to California, export out to the southwest, back and forth and also from our area down to Southern California.  
And I have not been able to determine if any of the systems that you have described function in the same way, or indeed if all of the entities you have identified are subject to fork, jurisdiction and debate to the extent we have, there is a long history in California involving a the munis and the IOU's over the use of the transmission system and the CIO itself, and its development of its services gets into a lot of uh, it's changes with entities and other parts of the West.  
So we really think we need to look at the studies and figure out a reasonable and defensible methodology that would allow for the reflection of time varying.  
Rates and location varying, yeah.

 **Claire Broome 350 Bay Area (Guest)** 1:51:52  
The allocation varying, it's it's come.

 **Woo, shirley (law)** 1:51:53  
Replicated.  
So we really need to look really and then we will and then we'll figure out what we can propose.  
You're already using the 12 CP.

 **Samuel Golding** 1:52:02  
Methodologies to allocate I presume to you know.  
Umm, those public power entities in the municipals as well as across customer classes within your your CPC jurisdictional customer base, right?  
So why?  
Why not just continue?  
I I'm not gonna make it.

 **Woo, shirley (law)** 1:52:22  
Commitment out that because I'm not sure of what exactly is going on and I will say when we try to verify what you asserted in your documents, we could not do it.  
So you're making assertions.  
I don't know if that's true or not.  
I just know that my client has indicated it really needs to study this.  
Come up with a defensible, reasonable methodology for time varying.  
Rates for retail and then take that to FERC on a schedule that will get us approval for whatever we propose in time to dovetail it with what comes out of our GRC 2024 case.  
I mean, that's our aim, to bring them all together at the same time.  
We're not gonna do.  
Let's take your hypothetical.  
Let's say that there is a transmission one.  
That's ahead by two years.  
We're not going to implement that before we do the rest of the retail dynamic rates.  
We wanna bring them together so.  
We've got our sources are.  
GAIL, hold it.  
We've got resources devoted to this.  
We know we have to do it.  
We're looking at a timeline and we're aiming to get it done at a time.  
And I also don't think it's productive.

 **Slocum, Gail (LAW)** 1:53:46  
During this workshop, for us to try to speculate about what the results of those studies would be.  
So while we appreciate the question, we are thinking about it.  
Umm, there may be differences of opinion, but to expect us to tell you right now what our approach before FERC is gonna be is is unreasonable.

 **Madduri, Parimalram "Achintya"** 1:54:21  
I don't know if you had any follow up to that, Sam, but uh OHS, sure, but I think I'll do it.

 **Samuel Golding** 1:54:29  
In writing, fair enough, seems reasonable.  
Umm, thanks uh thanks.

 **Madduri, Parimalram "Achintya"** 1:54:37  
For a happy bring, bringing that up and.  
Don't see any other God.  
Any other hands raised or issues in in chat and and I understand that the the transmission rate issue and that you're sticks tonality if at all is is fraught.  
So perhaps we should end where we are and where we are at this point.  
I wanted to thank everyone for participating.  
Thank you to the CC.  
Thank you to Saha Sifre AT and and thank you to all the the parties, the IU's and Microgrids resources coalition.

 **Edward Randolph (Guest)** left the meeting

 **Willie Calvin** left the meeting

 **Saxe, William** left the meeting

 **Madduri, Parimalram "Achintya"** 1:55:20  
And and the CCA's and and third parties.  
Umm so hopefully this has given an overview to the stakeholder to to all stakeholders of of what's in the working group report and and the individual proposals that I will note that there's a lot more detail and and these were very much a flavor of of the proposals.

 **Silicani, Bobby** left the meeting

 **Madduri, Parimalram "Achintya"** 1:55:43  
In addition, I want to flag again the working group shared folder which is being maintained by SCE, but is open to to all members of of them.  
Well, to it's open to the public, which has a variety of materials that went into that were part of the deliberations of the working group, that tools that were developed by LBNL on the BS of the CPU, C for the stakeholders of this proceeding to use to evaluate dynamic pricing, for instance for workbooks and so on.  
So I would encourage it.  
I would encourage all stakeholders as they formulate their comments to please look through the report and and as well.  
Please do look at at the at the working group folder if if you're interested in in, in diving deeper and especially accessing some of the tools that I've mentioned.  
And and so that's all umm I I have to say I I see that there is a handout.  
So let me just take that last question just in.  
Yeah, just a technical one.  
Do you know how long that working?

 **Strachan, Justin** 1:56:49  
Group folder will be available for or kept open.  
We we have.

 **Madduri, Parimalram "Achintya"** 1:56:56  
And we haven't figured that out.  
We're we're working on a on a long term transition for that, making sure that those materials are are hosted publicly.  
So we'll work with SCE to make sure that if if SE does have to umm transition that folder, the CPC can provide some provide a venue a a home for for continued public access to the working group materials. Thanks.  
OK, with that said.  
Thank you.  
Thank you everyone for this for attending this working group and we will post the yes, the the Today's presentations will be made available in the SharePoint and we will post the the recording as well in the SharePoint.

 **Lee Ewing (CPower)** left the meeting

 **Martinez, Vanessa** left the meeting

 **Collin Smith | Leap (Guest)** left the meeting

 **Ted Tayavibul** left the meeting

 **Sabrinna Soldavini** left the meeting

 **Wang, Stephanie** left the meeting

 **Madduri, Parimalram "Achintya"** 1:57:48  
OK.  
Thank you all.  
Thank you, Chantelle.

 **Cathy Yap (Guest)** left the meeting

 **Baum, Kayla** left the meeting

 **Madduri, Parimalram "Achintya"** 1:57:51  
Thank you.

 **Sahm White (Guest)** left the meeting

 **Woo, shirley (law)** left the meeting

 **June Bote** left the meeting

 **Slocum, Gail (LAW)** left the meeting

 **Jean** left the meeting

 **DeTuri, Jeff N** left the meeting

 **Strachan, Justin** left the meeting

 **Karen Herter** left the meeting

 **Lin, John** left the meeting

 **Iezza, Robert W** left the meeting

 **McCutchan, Melanie** left the meeting

 **Jameel Pueblos** left the meeting

 **ted@utilityadvocates.org** left the meeting

 **Alexis Rizo** left the meeting

 **Brandon Sanders** left the meeting

 **Reuben Behlihomji** left the meeting

 **Marisa Williams** left the meeting

 **Michel Kohanim** left the meeting

 **Rita Liotta-FEA** left the meeting

 **Elizabeth Reid** left the meeting

 **Horan, Daniel** left the meeting

 **Samuel Golding** left the meeting

 **Chetna Smith** left the meeting