

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



**FILED**

04/25/19  
04:59 PM

Application of Pacific Gas and Electric  
Company (U39E) for Approval of Demand  
Response Programs, Pilots and Budgets for  
Program Years 2018-2022.

Application 17-01-012

And Related Matters.

Application 17-01-018

Application 17-01-019

**MOTION OF THE PUBLIC ADVOCATES OFFICE TO ADMIT  
THE CONFIDENTIAL AUDIT REPORTS OF SOUTHERN CALIFORNIA  
EDISON COMPANY AND PACIFIC GAS AND ELECTRIC COMPANY**

**[PUBLIC]**

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April 25, 2019

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**[PUBLIC]**

Pursuant to Rule 11.1 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, the Public Advocates Office at the California Public Utilities Commission submits this motion to admit Southern California Edison Company's (SCE) and Pacific Gas and Electric Company's (PG&E) demand response auction mechanism (DRAM) audit reports into the record. Specifically, the Public Advocates Office requests that the confidential audit reports included as Attachments A and B of *Response of the Public Advocates Office on the Administrative Law Judge's Ruling Directing Responses to Questions Resulting from the February 11-12, 2019 Demand Response Auction Mechanism Workshop and Comments on Proposals to Improve the Mechanism*, be moved and admitted into the record of this proceeding.

As detailed in the Public Advocates Office's response to the April 10, 2019 Joint Demand Response (DR) Parties' motion to strike, the Public Advocates Office seeks to ensure that the Administrative Law Judge is apprised of the risks that DRAM, as it is currently structured, can place on ratepayers. After reviewing data request responses

seeking both SCE and PG&E's confidential DRAM audit reports, the Public Advocates Office concluded that SCE's Nexant Audit Report and PG&E's Summary of 2018-2019 DRAM RFO Audit Analysis, Results of December 4, 2018 support the concerns Energy Division and parties', including the Public Advocates Office, raised about the DRAM pilot that must be addressed prior to the adoption of DRAM as a permanent mechanism.<sup>1</sup>

To date, not all parties have had an opportunity to publicly discuss the audit and provide responsive comment. The Public Advocates Office considers a transparent, public review of the audit reports advantageous in developing a full record in this proceeding regarding necessary modifications to DRAM to protect ratepayers. However, given the potential delays entailed in making the audit reports public, the Public Advocates Office attached confidential versions of the audit reports as an expeditious way to include this information in the record now without delaying a June 2019 decision on the DRAM pilot.

To enable parties to further comment on the audit reports and the concerns that the audit reports highlight, the Public Advocates Office moves to admit PG&E's and SCE's audit reports into the record of this proceeding.

Respectfully submitted,

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<sup>1</sup> The motions of PG&E and SCE to include their respective audit reports into Energy Division's DRAM Evaluation also detail the risks of the current DRAM structure.

## **ATTACHMENT A**

PG&E Summary of 2018-2019 DRAM RFO Audit Analysis

[Redacted in its entirety]

## **ATTACHMENT B**

SCE's Nexant Audit Report

[Redacted in its entirety]