



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

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Application of Pacific Gas and Electric Company
(U 39-E) for Approval of Demand Response
Programs, Pilots and Budgets for Program Years
2018-2022.

Application No. A.17-01-012
(Filed January 17, 2017)

And Related Matters.

Application No. A.17-01-018
Application No. A.17-01-019

**COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
ON DRAM IMPROVEMENTS**

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January 11, 2019

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Pursuant to Judge Hymes' January 4, 2019 ruling inviting parties to file comments on improvements to the Demand Response Auction Mechanism, San Diego Gas & Electric Company ("SDG&E") submits these comments.¹

The following focuses on improvements to the DRAM as requested by Judge Hymes. Some of the below recommendations were also included in SDG&E's response to the August ruling. At minimum, SDG&E submits:

1. The Commission should implement a plan with the CAISO to count Local Resource Adequacy.
2. SDG&E recommends restricting the number of changes to resource IDs by DRPs to reduce work.
3. Remove Section 1.5.b of the proforma contract, since the registration cap is no longer a limiting factor for contract fulfillment.
4. Remove Section 1.6.a.iii of the proforma contract to prevent the counterparties demonstrating the capacity of their resources without any actual performance from customers.

¹ Judge Hymes' email of January 7, 2019 provided additional guidance: "To be clear, I am only looking for a general description of the recommendation at this time, *i.e.*, a one-pager."

5. Modify the demonstrated capacity calculation in the proforma contract to include all applicable hours.
6. The proforma contract should require DRPs submit their year-ahead Supply Plans in order to allow IOUs to utilize the RA capacity in the year ahead showing.

SDG&E looks forward to discussing these recommendations as well as others that may arise in the upcoming January and February workshops.

Respectfully submitted,

/s/ E. Gregory Barnes

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