

**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.

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(Filed January 17, 2017)

And Related Matters.

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2019 DRAM RFO AUDIT ANALYSIS, RESULTS AS OF DECEMBER 4, 2018” IN
ENERGY DIVISION’S FINAL EVALUATION REPORT OF THE DEMAND
RESPONSE AUCTION MECHANISM**

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December 20, 2018

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Pursuant to Rule 11.1 of the Commission’s Rules of Practice and Procedure, OhmConnect, Inc. (OhmConnect) respectfully submits this timely response to the *Motion of Pacific Gas and Electric Company (U 39 E) for Inclusion of “PG&E Summary of 2018-2019 DRAM RFO Audit Analysis, Results as of December 4, 2018” in Energy Division’s Final Evaluation Report of the Demand Response Auction Mechanism* (“Motion”), filed and served on December 12, 2018 in the above-captioned proceeding. In the Motion, PG&E requests that a confidential audit report (the “December Audit Report”) concerning three of PG&E’s 2018-2019 Demand Response Auction Mechanism (DRAM) Pilot counterparties “be made part of the Energy Division’s (ED) final evaluation of the DRAM pilot”.¹

OhmConnect observes that PG&E’s Motion is similar in substance to the motion filed by SCE in this proceeding on December 6, 2018, in which SCE requests that an audit report prepared on its behalf by Nexant (the “Nexant Audit Report”) and concerning one of SCE’s DRAM Pilot counterparties “be made a part of the Energy Division’s (ED) final evaluation of the [DRAM Pilot]”.² On December 19, 2018, OhmConnect filed and served in this proceeding a

¹ December 12, 2018 Motion of PG&E, at p. 1.

² See December 6, 2018 *Motion of Southern California Edison Company (U 338-E) for Inclusion of Independent Audit Report in Energy Division’s Final Evaluation Report of the Demand Response Auction Mechanism*, at p. 1.

response in opposition to SCE's December 6, 2018 motion.³ In the present response, OhmConnect likewise opposes PG&E's Motion, for the same basic reason it opposes SCE's motion: inclusion of PG&E's December Audit Report in Energy Division's final evaluation of the DRAM Pilot would contravene the requirement in CPUC Decision (D.) 16-09-056 that the DRAM Pilot review process "ensure transparency and due process to stakeholders".⁴

Its opposition to the Motion notwithstanding, OhmConnect concurs with PG&E that individual customers' load curtailments should be counted once and only once in establishing a DRAM Seller's monthly Demonstrated Capacity.⁵ Moreover, OhmConnect shares PG&E's resolve "to improve [the] DRAM and address [its] flaws, in response to the Commission's direction, and in consultation with stakeholders".⁶ OhmConnect maintains, however, that the appropriate forum for addressing this and other issues with the DRAM is the public stakeholder workshop ordered by D.18-11-029 and scheduled for January 16, 2019.^{7,8}

Respectfully submitted,

December 20, 2018

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³ See December 19, 2018 *Response of OhmConnect, Inc. to Motion of Southern California Edison Company (U 338-E) for Inclusion of Independent Audit Report in Energy Division's Final Evaluation Report of the Demand Response Auction Mechanism*.

⁴ D.16-09-056, at p. 66.

⁵ December 12, 2018 Motion of PG&E, at pp. 2-3.

⁶ *Ibid.*, at p. 3.

⁷ D.18-11-029 states that, "following the issuance of the [DRAM Pilot] evaluation results in December 2018, Energy Division will present its results at a workshop and the Administrative Law Judge will facilitate a discussion on the Energy Division recommendations" (p. 83).

⁸ On November 28, 2018, Energy Division sent an email to the service list of A.17-01-012 et al. noticing a DRAM workshop to occur on January 16, 2019.