

VALLEY CLEAN ENERGY ALLIANCE

Staff Report – Item 9

To: Board of Directors

From: Rebecca Kuczynski, Chief Customer Officer
Mitch Sears, Chief Executive Officer

Subject: VCE's Load Management Standards Plan Annual Update

Date: June 11, 2026

Requested Action

Informational item. No action requested.

Background

The California Energy Commission's (CEC) Load Management Standards (LMS) are intended to help integrate renewables on the grid by aligning electricity use with generation and capacity. The CEC's goals are to improve air quality, help mitigate future climate change and create downward pressure on electric rates. The CEC requires that load-serving entities offer rates or programs that reflect real-time grid conditions, including dynamic rates. To meet the LMS, VCE is allowed to either create its own rates or programs or participate in PG&E's programs and rate offerings.

The CEC's primary objectives of the LMS encompass:

1. Ensuring all time-varying rates are uploaded to the Market Informed Demand Automation Server (MIDAS)
2. Developing a standard rate information access tool
3. Creating and submitting location marginal price-based rates that reflect marginal wholesale costs.
4. Educating customers on new time-varying rates and automation technologies

VCE's Board of Directors approved VCE's revised Load Management Standards Plan April 10, 2025, and the CEC requires that VCE submit an annual LMS Plan Update, detailing any progress toward stated LMS goals that VCE has made since the plan was submitted.

Progress - LMS Goals

Progress toward VCE's LMS goals between April 2025-March 2026 included compliance-related items such as uploading rates into Market Informed Demand Automation Server (MIDAS) and adding Rate Identification Numbers (RINs) to customer bills in QR code format so that customers can scan and learn more about their electricity rates. VCE also made progress through the continuation of programs, as well as adding new program and rate designs.

Programs that demonstrated progress toward the load-shifting goals detailed in the LMS plan include:

- Electric Advisor: the free, concierge service for residential VCE customers that helps them to navigate electrification, energy efficiency, and other load-modifying installations
- REACT Pilot: designed to help non-residential customers transition to electric vehicles and shift their peak load, enroll in dynamic rates, and install bidirectional charging where applicable
- Hourly Flex Pricing: designed to help residential and non-residential customers to shift load through hourly price signals that incentivize load shifting

VCE demonstrated progress on rates and programs under development, including:

- The Microgrid Incentive Program: application has been submitted for a \$14M grant for a microgrid project in Capay Valley that would increase resiliency. Project would include front-of-the-meter batteries, solar, and property purchase and project management costs.
- Rate Design: VCE is exploring a new dynamic rate design that would incorporate elements of Time-of-Use (TOU) rates as well as hourly dynamic prices, to compensate for some issues that have arisen in the Hourly Flex Pricing pilot.

Conclusion

VCE has submitted the attached 2026 LMS Report to the CEC to meet its compliance obligations.

Attachment

Attachment A: VCE's Annual LMS Report 2026 without Listing of RIN's

Load Management Standards

Annual Report of Compliance Plan Implementation

Valley Clean Energy

May 11, 2026



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1. Introduction

In accordance with California Code of Regulations, Title 20, Section 1623.1(a)(3)(C) (20 CCR § 1623.1(a)(3)(C)), each Large Community Choice Aggregator (CCA) is required to submit to the Executive Director of the California Energy Commission (CEC) annual reports demonstrating its implementation of its Load Management Standards (LMS) Compliance Plan approved pursuant to 20 CCR § 1623.1(a)(3)(B). This report is required to be submitted one year after the compliance plan is approved pursuant to subsection 20 CCR § 1623.1(a)(2) and annually thereafter.

On May 9, 2024, the Valley Clean Energy Board of Directors approved Valley Clean Energy's (VCE) LMS Compliance Plan. A revised version of VCE's LMS Compliance Plan was submitted to the CEC on April 15, 2025, and approved by the CEC at its May 8, 2025, Business Meeting.

Since approval of the LMS Compliance Plan, VCE has progressed in the following areas relating to its LMS Compliance Plan:

- Submission of time-dependent rates to CEC's Market Informed Demand Automation Server (MIDAS) via the MIDAS API (20 CCR § 1623.1(c))
- Providing Rate Identification Numbers (RINs) on customer billing statements and online accounts using both text and QR code, including both VCE and PG&E RINs for unbundled customers (20 CCR § 1623(c)(4))
- Participation in the development of a Single Statewide RIN Access Tool (SST) (20 CCR § 1623(c)(1))
- Development of load flexibility rates and programs (20 CCR § 1623.1(a)-(b))

Updates for each LMS milestone are below.

2. Time-dependent rate submission to MIDAS and RINs

2.1 MIDAS

CEC mandated large CCAs, including VCE, to include a RIN on customer bills by April 1, 2024. In compliance with this requirement, VCE implemented RIN and QR codes on customer bills. Presently, QR codes do not link to a specific webpage, but this may be considered as more progress is made on the development of the Single Statewide Tool. VCE has been monitoring and engaging in the process with other regulated load serving entities (LSEs) to develop the statewide RIN tool pursuant to 20 CCR Section 1623(c). A proposed plan for the tool was submitted to the CEC for review on October 1, 2024. VCE will continue to collaborate with other LSEs and the CEC toward the implementation of the statewide RIN tool in a timely manner subject to the tool's approval by the Commission.

2.2 RINs

Hourly rate tables for each of VCE's Time-of-Use (TOU) rates have been consistently uploaded to MIDAS, meeting both the format and technological delivery standards set by the CEC. VCE maintains the capability for continued compliance and will keep uploading time-dependent rates once dynamic rates are finalized in 2027 and thereafter. A list of Rate Identification Numbers (RINs) uploaded to MIDAS is provided in Attachment A.

3. Participation in the development of an SST

The Commission has extended the RIN Tool final plan deadline to May 8, 2029, in its Order No. 26-0312-03b docketed to Docket No. 23-LMS-01 on March 24, 2026. Further, CEC staff is planning to present an OIR for the Commission's approval at the Business Meeting in Q2 of 2026, which will likely address possible amendments to the RIN Tool requirement. VCE will continue to monitor and participate in the development and implementation of the Single Statewide Tool.

4. Development of load flexibility rates and programs

4.1 Active Load Flexibility Rates and Programs

4.1.1 HFP

VCE was the first CCA in California to pilot a dynamic rate in its (now closed) Agricultural Flexible Irrigation Technology, or AgFIT, Pilot for agricultural customers. When the California Public Utilities Commission decided to expand the pilot into PG&E's Hourly Flex Pricing (HFP) Pilots, VCE was excited to participate, and is actively participating in both Pilot 1 and Pilot 2; as well as PG&E's Vehicle-Grid Integration (VGI) Pilot. HFP Pilot 1 is offered to agricultural customers, and HFP Pilot 2 and VGI are offered to residential and non-residential customers that qualify under the eligibility rules laid out by the California Public Utilities Commission.

4.1.2 CHARGE Pilot

VCE's is working with UC Davis and Panasonic on the active Coordinated Home Automation via Real-Time Grid Economics Study, or CHARGE Pilot. The pilot seeks to enroll a test bed of 25 single-family residential customers in a dynamic rate and is currently using HFP Pilot 2 for this rate. The CHARGE Pilot provides eligible customers with a range of incentives, which could include heat pump water heaters, electric vehicle chargers, and/or home battery storage; provides the software to automate the customer response to dynamic prices, and monitors customer load shift behavior. The pilot builds on a similar, successful pilot initiated by Sacramento Municipal Utilities District (SMUD), UC Davis and Panasonic. The pilot is currently enrolling customers but is facing a major hurdle in recruitment since PG&E does not support solar customers, as discussed in more detail in Section 4.1.5.

4.1.3 Electric Advisor Program

VCE operates a residential [Electric Advisor](#) program, which is a free service for VCE residential customers. The service is an enhanced customer care resource, otherwise known as a "concierge service," which helps support customers who are trying to electrify their homes and/or become more energy efficient. The program integrates with VCE's existing customer care, and customers receive a dedicated account manager who can scale their service level from simple questions to whole-home electrification plans, reviewing contractor bids, etc.

4.1.4 REACT Pilot

Launched in early 2025, VCE's Rural Electrification and Charging Technology (REACT) was designed to help businesses transition to electric vehicles by giving incentives for electric vehicle (EV) charging equipment. The program, which involves three partners – Gridtractor (the main grantee from the CEC's REDWDs grant, Monarch Tractor, and VCE; also gives eligible participants the option to engage in bidirectional charging and enroll in dynamic electricity rates (through Hourly Flex Pricing) to shift load off peak times. REACT provides incentives for charging infrastructure, hardware, and software to lower the costs of deploying electric tractors and vehicles for customers. Work on the REACT Pilot has been paused, as one pilot partner (not VCE) is currently unable to maintain its scope.

4.1.5 Issues with Hourly Flex Pricing (HFP)

VCE offers HFP pilot rates to eligible customers, as well as incorporating HFP rates into other pilot program designs. This approach, though administratively simpler for VCE, has led to significantly lower enrollment in the connected pilots. For example, VCE's active Coordinated Home Automation via Real-Time Grid Economics Study, or CHARGE Pilot, is currently using HFP for the pilot's dynamic rate. Customers are required to be on a dynamic rate to enroll in CHARGE, and currently HFP is VCE's only active dynamic rate.

PG&E is not supporting solar customers in its HFP Pilots and has no estimate of when it will be able to, which has been a not insignificant flaw in the Pilots' rollout. Most of the customers that expressed interest in enrolling in CHARGE have been solar customers, which is causing VCE to explore dynamic rate options that could enroll solar customers, and can be deployed independently of the investor-owned utilities, though this is a large challenge for the agency, as VCE has a very small full-time staff for its size. This is discussed further in Section 4.2.2.

HFP constraints were also a barrier in the REACT Program – VCE supported a wider rates eligibility umbrella when the CPUC first proposed its decision, but ultimately, the eligibility was fairly restricted, and if customers wanted to enroll in HFP, many of them (including customers whose rate was eligible in the preceding AgFIT Pilot) would have had to change their rate to participate in HFP, which was a barrier to enrollment for many customers.

4.2 Rates and Programs Under Development

4.2.1 Microgrid Incentive Program

In December 2025, VCE submitted an application for the Microgrid Incentive Program, funded by the Public Purpose Program Charge (paid by all utility customers), and administered by PG&E. VCE applied for a \$14 million Application Incentive Request (AIR). This covers eligible project engineering and development costs, such as in-front-of-the-meter (IFOM) batteries and generation resources, project management, and property purchase costs. This effort involved engagement of Yolo County stakeholders, including the Yocha Dehe Wintun Nation. The submission is pending, and awardees should be announced in Q2-Q3 2026.

4.2.2 Other Dynamic Pilot Rate Designs

Because PG&E is unable to enroll solar customers in HFP, VCE has begun to explore other options for dynamic rates. Not being able to include solar customers in pilots like the above-mentioned CHARGE Pilot, because they cannot enroll in HFP, is a major barrier to both

recruitment and accurate Pilot results. VCE's recent recruitment efforts with the CHARGE Pilot demonstrated that solar customers tend to be "early adopters," and are eager to participate in load-shift pilots – most of the customers that applied to enroll in CHARGE were solar (NEM and Solar Billing Plan), and VCE was unable to enroll them because this pilot requires a dynamic rate and PG&E cannot support solar customers in HFP.

VCE is exploring different dynamic rate approaches and is in the design phase for a pilot dynamic rate that could be LMS-compliant. The rate would incorporate elements of Time-of-Use (TOU) rates, as well as a day-ahead hourly dynamic design. The pilot rate would allow solar customers to participate. However, if PG&E is ultimately unable to support solar customers in its HFP rates, complications could arise for VCE since CCAs do not set rates for transmission and delivery, and this may lead to complications for the non-generation portion of the pilot rate.

4.3 Material Deviations

VCE notes that the only material deviation did not concern the 2024 LMS Compliance Report directly and is not expected to adversely affect compliance with LMS regulations. However, the Report contains VCE's Board's Strategic Plan goal mentioned in section 1.2.1. The former goal reads:

***Procurement Strategy:** Commitment to serving 100% of retail sales with renewable energy by 2030*

The Board voted to change the goal when the Strategic Plan was renewed in 2025, partly in response to upcoming changes in hourly resource matching for Power Content Label calculations. The revised goal is [to]: Manage power supply resources to consistently exceed California's Renewable Portfolio Standard (RPS) while working toward a resilient resource portfolio that is 100% Carbon-Free and a minimum of 90% Renewable by 2030. More information can be found in VCE's 2025 Strategic Plan update here:

<https://valleycleanenergy.org/wp-content/uploads/Item-13-VCE-2026-2029-Strategic-Plan-Major-Update-10-14-25.pdf>.

4.4 Cost Effectiveness

The AgFIT Pilot's final evaluation report¹ was somewhat inconclusive on cost recovery. The data is based only on a subset of agricultural customers, and VCE is hesitant to apply these results to the cost effectiveness of other rate classes or pilots. As a result, VCE's evaluation of cost effectiveness is based on this limited assessment. VCE anticipates being able to refine estimates to inform future updates of its Plan as more results become available in pilots being conducted around the state of California by other load-serving entities (LSEs).

¹ <https://www.dret-ca.com/wp-content/uploads/2025/04/VCE-AgFIT-Pilot-Final-Evaluation-Report.pdf>.

5. Conclusion

VCE has made progress on, and remained in compliance with its Board-approved Load Management Standards (LMS) Plan. VCE has continued to advance priorities shared by VCE and the State of California, including:

- Uploading rates into MIDAS;
- Implementing and maintaining RINs on customer bills;
- Participating in the development of a Statewide Tool; and
- Development and implementation of load flexibility rates and programs.

VCE has also identified several challenges that could complicate further progress on LMS goals and priorities:

- PG&E's inability to support solar customers in HFP has created a significant recruitment barrier for VCE's pilots reliant on dynamic rates. VCE has begun exploring dynamic rate options that can be deployed independently and accommodate solar customers; and
- The REACT Pilot has been temporarily paused due to circumstances outside of VCE's control, with updates to follow in the next Annual Report.

VCE remains committed to supporting its customers and service territory through its load flexibility efforts, and it will continue to evaluate rate and program designs that reflect its values of affordability, clean energy, and grid reliability as the LMS framework evolves.

ATTACHMENT A

VCE RINs Uploaded into MIDAS

**PAGES 9 - 101 LISTING RINs HAVE BEEN REMOVED
FOR THIS STAFF REPORT**