

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

Application of SOUTHERN CALIFORNIA
GAS COMPANY (U904G) for adoption of
its 2020 Flex Alert Marketing Campaign.

A.19-11-018

**OPENING COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
ON THE PROPOSED DECISION**

Pursuant to Rule 14.3 of the Commission’s Rules of Practice and Procedure, the California Independent System Operator Corporation (CAISO) submits these comments on the Proposed *Decision Denying Southern California Gas Company’s 2020 Flex Alert Campaign and Cost Recovery Request* (Proposed Decision).

The Proposed Decision properly acknowledges that in light of the recommendations identified by the Commission, the CAISO, and the California Energy Commission in the Preliminary Root Cause Analysis of the rotating outages that occurred during the August 2020 heat storm, the funding and programmatic design of the paid media component of Flex Alert may be evaluated in a future rulemaking.¹ Subsequent to issuing the Proposed Decision, the Commission issued an Order Instituting Rulemaking (OIR) to address electric reliability issues, including future funding and modernization of the Flex Alert program.² The CAISO agrees that electric reliability OIR is the appropriate proceeding to consider any modification of and future funding for the Flex Alert program. As a result, the CAISO supports the Proposed Decision closing this proceeding.

Dated: December 2, 2020

Respectfully submitted,

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¹ Proposed Decision, p. 1.

² Rulemaking (R.) 20-11-003.

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