



## DR POLICY WORKING GROUP MEETING 6/2/22

### Agenda

1. Discuss 2023 DR applications
2. Discuss Council comments on RA PD
3. Other issues

### Meeting Notes

#### **Discuss 2023 DR applications**

We have developed an initial cut of our DR application [comments](#), which include offering our broad perspectives/insights for both phases of the proceeding: (1) 2023 bridge year proposals and (2) 2024-27 proposals.

The Council will be offering overarching perspectives for Phase 1, rather than honing in on utility-specific proposals which we will address during Phase 2.

For Phase 1, we will be seeking a settlement (entirely for SCE and SDG&E, and most of PG&E's).

The aspect of PG&E's proposal that we have concerns is their bid to pass along any RAIM penalties onto ratepayers, but we are not necessarily willing to take a lead on making this objection.

Opening comments are due on Monday 6/6.

#### **Discuss Council comments on RA PD**

The PD failed to address our specific proposals regarding DR counting (from the CEC QC counting working group), and we are going to push back to see why CPUC did not address our proposals or comments.

There seems to be a misunderstanding by the CPUC about the scope and intent of our near-term counting proposals.

We are continuing to socialize with the RA and DR groups at the CPUC.

The PD has a number of questions that we are addressing.

Some of the specific elements of our comments include:

- RA measurement hours
- QC for DR counting (LLOP method should not be continued)
- Penalty structure (consistent with what IOUs currently use)
- Testing requirements: They are exempting IOU programs from the testing and only applying this to “high risk” DR programs, which includes load aggregator programs.
  - Low risk programs require biannual testing, but there is no requirement for evidence in this regard.
  - We are going to remind the CPUC about contradictions in what constitutes waiver of extra testing requirements.
- Slice-of-day proposals (generally supportive but push back on retaining the 4-hour availability assessment requirement).
- DR cap issue ... want to be making a case for eliminating this requirement
  - We need to find a way to address this topic within the current PD.

### **Other issues**

None.

### **Next Working Group Meeting**

Our next Working Group meeting will be on **Thursday, July 7th at 9:30 am**. The call-in coordinates for this call are below.

[Zoom link](#)

Call-in: +13017158592,,84698809296#

Passcode: cedmc2022