



DR, DERs + Resilience Committee

April 4, 2023



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Today's Agenda

• Issues/Topics

- Resource Adequacy Phase 2 PD comments
- Update on 2024-2027 IOU DR applications
- PHC for SoCalGas DR pilot application
- ED call on 3P needs in Flexible Demand proceeding
- Update on AL 4950-E (ELRP)
- Quick hits



Resource Adequacy Phase 2 PD comments

- On 3/23, the Council & Leap submitted [joint comments](#) on the RA Phase 2 PD addressing 2024 Slice-of-Day test year parameters
- Key points include:
 - Support hourly DR QC variability but oppose 5-9 p.m. availability requirement; this will discourage DR growth outside of these hours
 - If adopted, availability limitations should be re-visited for the 2025 RA year
 - Changing the TLF Adder to 0% is akin to eliminating it; any changes should be addressed in Phase 3
- No reply comments filed by the Council
- Next steps: Waiting for final decision (likely on 4/6)



Update on 2024-2027 IOU DR applications

- On 3/30, the Council submitted [opening comments](#) on Q1A-B of the 3/3 Ruling
- Ruling acknowledged concerns about redacted data in Nexant (Resource Innovations) Report acting as impediment
- Provided less redacted version of the Report for use in Phase 2 & asked for feedback on providing certain additional data to DRAM sellers and “non-market parties”
- Council supported providing DRAM sellers’ data but need to determine how data requests or evidentiary hearings to be managed; also supported allowing non-market parties to access all data but highlighted need to define this term
- SCE and SDG&E generally argued that parties should not have different access to data
- Next steps: Reply comments due 4/14

Update on 2024-2027 IOU DR applications (cont.)

- On 3/30, the CPUC issued a [Ruling](#) seeking comment on whether certain anonymized load shape data files from the Phase 4 DR Potential Study are sufficiently aggregated to meet customer confidentiality standards to be released to the public
- The Phase 4 study will project future potential for Shed and Shift DR in California through 2050, based on hourly meter data from 400,000+ meters in the three IOU service areas; it is currently under review by the Energy Division
- Next steps: Opening comments due 4/28; reply comments due 5/19



PHC for SoCalGas DR pilot application

- On 3/9, the CPUC held a pre-hearing conference on the SoCalGas DR pilot application (A.23-01-004)
- The ALJ was hostile to the application, asking SoCalGas to justify its proposed budget, pilot scope, and cost-effectiveness
- Some parties argued that the pilots should be cost-effective and should promote equity
- SoCalGas later held a meet-and-confer call to determine the scoping issues for which there is and is not consensus
- Next steps: Post PHC statement will be filed this week; expect subsequent scoping memo and final schedule



ED call on 3P needs in Flexible Demand proceeding

- On 3/23, the Energy Division DR Section held a call with third parties (incl. CEDMC, Olivine, BMW, ChargePoint, ecobee, EnergyHub, Polaris) and CEC to understand barriers and challenges 3Ps face in offering demand flexibility services to customers through a CalFUSE-type framework
- Key feedback included:
 - Need to minimize the cost of doing business, incl. make easy to integrate multiple devices to promote customer and 3P participation
 - Need to articulate the value proposition for 3Ps and customers to participate
 - 3Ps need quick access to high quality meter data
- Observations:
 - ED wants to create an attractive business model for DER providers outside SS DR
 - ED leaning toward day-ahead, hourly proxy prices
- Next steps: Olivine is leading an ad hoc group on systems & processes

Update on AL 4950-E et al (ELRP)

- On 1/17, IOUs submitted an [advice letter](#) modifying the Emergency Load Reduction Program; protests & responses were submitted by [Council/Leap/OhmConnect](#), CESA, CLECA, CalSSA, PAO, CEJA/Sierra Club/UCS, VGIC
- IOUs issued a response on 2/13
- On 3/24, IOUs submitted [AL 4950-E-A](#) based on consultation with the ED making additional revisions
 - Modify the Group A ILR methodology
 - SCE added clarifying language on meter data used for performance and settlement
 - PG&E/SCE updated day-of adjustment range for sub-group A1-A5 from +40% to +/-40%
 - PG&E added additional language pertaining to Privacy Notice
- Next steps: Expect ED approval through a disposition letter

Quick hits

- On 3/29, CPUC held a PHC in the DER Cost-Effectiveness/Data Access proceeding (R.22-11-013)
 - Track 1: Make cost-effectiveness assessments more accurate and consistent across DER programs; includes ACC update process, SCT, T&D avoided costs
 - Track 2: Improve data access to facilitate DER adoption, improve DER utilization, improve DER grid integration; includes customer privacy, ESJ-specific data
 - Lots of discussion on connection w/ R.22-07-005; CCAs talked a lot about data latency issues
 - Next steps: April ruling on scope and composition of Data Working Group (w/ expert facilitator); scoping memo
- The CEC has scheduled a 4/10 [workshop](#) on draft revised guidelines for the Demand Side Grid Support program
 - No draft released yet
 - Written comments may be submitted by 4/25
- On 3/22, CPUC issued [D.23-03-020](#) clarifying the DR Competitive Neutrality Cost Causation rules approved in D.17-10-017, in response to a PFM submitted by the IOUs, AReM/DACC, 2 CCAs, and CLECA

Quick hits

- On 3/21, the CEC opened a [new docket](#) on Load Management Standards Implementation
 - Intended for CEC to provide guidance on submissions by entities regulated by the CEC's LMS
 - To include LMS compliance plans, plan updates & modifications, annual reports, requests for delays, etc.
- On 3/17, the CPUC issued a [proposed decision](#) adopting updated electric rate design principles and new demand flexibility design principles in R.22-07-005
 - Some Council suggestions were adopted
 - Next steps: Opening comments due 4/6; reply comments due 4/16



Discussion & Q&A

Thank You!

Please contact us if you have any questions.

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