DOCKETED	
Docket Number:	25-IEPR-05
Project Title:	Load Shift Goal Update
TN #:	264597
Document Title:	Advanced Energy United Comments - Advanced Energy United's Comments on the Load Shift Goal Workshop and Update
Description:	N/A
Filer:	System
Organization:	Advanced Energy United
Submitter Role:	Public
Submission Date:	7/9/2025 4:22:05 PM
Docketed Date:	7/9/2025

Comment Received From: Advanced Energy United
Submitted On: 7/9/2025
Docket Number: 25-IEPR-05

Advanced Energy United's Comments on the Load Shift Goal Workshop and Update

Additional submitted attachment is included below.

ADVANCED ENERGY UNITED™

California Energy Commission
715 P Street
Sacramento, CA 95814

July 9, 2025

Docket 25-IEPR-05: CEC Integrated Energy Policy Report Workshop on CA's Progress Towards the Load-Shift Goal

Advanced Energy United's Comments on the Load Shift Goal Update

Introduction

Advanced Energy United ("United") appreciates the opportunity to submit comments following the CEC's workshop on California's Progress Towards the Load-Shift Goal. United is a national trade association comprised of over 100 companies both large and small across the technology spectrum, including energy efficiency, demand response, solar and wind generation, enhanced geothermal, energy storage, electric vehicles and charging equipment, advanced metering infrastructure, transmission and distribution equipment, distributed energy resource ("DER") aggregators and enabling software.

Senate Bill 846 ("SB 846") directed the CEC to develop a goal for "shifting load to reduce net peak electrical demand and policies to increase demand response and load shifting."[1] In the 2023 Load-Shift Goal Report published by the CEC, the CEC reported that a 7,000 MW goal is achievable by the end of the decade.[2] This goal was based on the CEC's understanding that there is already 3,100-3,600 MW of load-flexibility in California, and so proposed an additional 3,400-3,900 MW of incremental flexibility.[3] To give stakeholders an update on the load-shift goal, the CEC hosted a workshop on California's Progress Towards the Load-Shift Goal on June

[1] California Energy Commission, Commission Report: Senate Bill 846 Load-Shift Goal Report (May, 2023) at p. 1.
[2] *Id*. At p. 3.
[3] *Id*. At. p. 4.

25. United's comments below are specific to the workshop and solutions the CEC should consider to achieve the load-shift goal.

Comments

United commends the CEC for the quality of the workshop on California's Progress Towards the Load-Shift Goal on June 25. We found this to be a productive workshop, with broad participation and important topics. We were particularly struck by the consistent reference to major issues stymying progress to load flexibility, including program simplicity and stability, performance measurement, resource adequacy, and data access. In these comments, we would like add perspective from our members on two of these topics: data access and performance measurement. We also note the importance of reflecting the most recent information on successful load flexibility programs, especially the Demand Side Grid Support program, because leveraging the remarkable scale-up success of this program should be a key plank in any strategy going forward.

a. Data Access

The Commissioners expressed interest in exploring data access solutions for California during the workshop. United has been advocating for a statewide data access platform in California across multiple dockets at both the CEC and the California Public Utilities Commission ("CPUC") because data access is fundamental to successful scaling of load flexibility We urge the Commission to make data access a core part of any load flexibility strategy going forward, and recommend specifically exploring a statewide data access platform as detailed below.

Data access can encompass several different categories of data that facilitate load flexibility. Customer energy usage, account, and billing data are foundational to demand response and other efforts that enable load flexibility. While the CPUC has addressed several types of data access in disparate ways, one of the state's largest use cases is customers consenting for utilities to transfer this information to DER aggregators. With core usage and billing data, transmitted electronically, DER service providers can size DER systems so that customers can respond to time-of-use rate signals; measure customer performance to enable compensation

for load shifting or conservation; assess program eligibility and braid rebates or other sources of funding; and manage wholesale market settlement.

Supplementing core usage and account information with data related to which tariff a customer participates on and their locational grid value can enable increasingly more sophisticated offers that allow customers to stack value and for ratepayers to realize deeper reductions in grid infrastructure and operations costs. As more customers participate and there is greater experience leveraging data and measuring customer behavior, DER service providers can design and refine new load flexibility offerings.

Unfortunately, utilities' current data-sharing tools are insufficient to nearly double load flexibility by the end of the decade. Participants in the January 27 and March 24, 2025, stakeholder workshops for the CPUC Data Working Group raised numerous challenges including system outages, data formatting, and cumbersome approval processes. This is why both CEC and CPUC proceedings continue to raise questions about the sufficiency of data-sharing practices despite nearly a decade of experience with utility-implemented tools like Share My Data, and why states like Texas, New York, New Hampshire, and Massachusetts are implementing or exploring multi-utility data-sharing platforms to promote robust DER marketplaces.

i. Program Examples from Workshop

The June 25 workshop highlighted examples of data access platforms in use or in implementation in other jurisdictions. As noted by Commissioner McAllister in the workshop, programs that work in other jurisdictions may not be directly transferrable to California. Nevertheless, these examples are important and relevant in that they illustrate a range of what is possible, as well as lessons learned and best practices, and the potential benefits to be unlocked by developing broadly accessible data access tools. For instance, the workshop hosted a panel with a presenter from Energinet in Denmark. Energinet has been using their DataHub, and now DataHub V2, platform since 2013 to facilitate data access across their network. This system has proven critical in significantly expanding load flexibility through both

passive (e.g. time-of-use pricing) and active (e.g. VPP) programs. Energinet stands alongside domestic U.S. examples including SmartMeter Texas and Integrated Energy Data Resource being developed by New York State Energy Research and Development Authority ("NYDERDA"), as well as programs under development in Illinois and New England.

United commends the Commission for exploring these examples, and we believe this workshop – in addition to the multiple rounds of comments and discussion in related proceedings at the CEC and CPUC – provide ample support for the CEC's 2025 Load Shift Goal Update to describe the potential of a statewide data access platform in California and to recommend that the CEC, in coordination with the CPUC, convene a Working Group and issue a Request for Information to scope out a California data access platform.

ii. Request for Information for Data Access Frameworks

In January, United submitted comments into the CEC's Load Management Standards proceeding describing the numerous problems with customer energy use and rate data access, and proposing that the CEC investigate alternatives, including through hosting a workshop to hear about centralized data access platforms in other jurisdictions and issuing an RFI to receive proposals for a California platform.[4] In March, United facilitated presentation and discussion of other states' data access systems within the CPUC's Data Working Group, convened under the auspices of proceeding R.22-11-013. In June, United submitted comments to the CPUC Data Working Group that recommended the CPUC investigate alternative data access frameworks, including issuing a Request for Information ("RFI") to learn about potential data access platform systems.[5]

United strongly urges that the CEC's Load Shift Goal Update recommend that the CEC, CPUC, and the CAISO initiate a multiagency approach to investigate statewide data access

[4] Docket 23-LMS-01, Advanced Energy United's Comments on the Questions Regarding Load Serving Entities' Plan for a Single Statewide Rate Access Tool (Filed Jan. 17, 2025).
[5] CPUC R.22-11-013 Data Working Group, Comments of Advanced Energy United to the CPUC Data Working Group (Filed Jun. 13, 2025).

frameworks and that the CEC release an RFI to gather proposals regarding a statewide data access platform.

We recommend such an RFI be issued under the auspices of the CEC's Load Management Standards proceeding and that the objectives and terms of the RFI be developed by a CEC-led working group or workshop to include the range of load-serving entities, customer types, third-party solution providers, and ratepayer advocates that would be served by the platform. We recommend that the RFI describe a broad set of potential use cases that could potentially be served by the data access platform, but that respondents be allowed flexibility in proposing which data types and use cases would be encompassed by their proposed solutions. This would allow the CEC, partner agencies, and stakeholders to assess the opportunities and trade-offs of different functionality and cost.

This is where interagency collaboration will be most important. Load flexibility requires core data sets that could enable many diverse use cases—in other words, many major use cases significantly overlap in terms of the level of granularity, time sensitivity, and categories of data they require. It is not necessary, and likely misleading, to explore every use case separately within regulatory siloes and establish cost-effectiveness exclusively for each use case, when a foundational platform could be built, and furthered developed over time, to address a variety of use cases. Unfortunately the piecemeal use case process is the regulatory default. This is why we urge the CEC to take the opportunity of the 2025 Load Shift Goal Update to call for interagency collaboration in exploring a statewide data access platform.

Critically, it is also important to establish what California entities *currently* spend on data access, to demonstrate the cost-effectiveness of any statewide platform proposal. California Load-Serving Entities (primarily Investor-Owned Utilities) currently spend significant sums on existing data access systems, have proposed large investments in additional capacity related to data access,[6] and have existing regulatory requirements for new capabilities that will incur

[6] I.e. PG&E's Billing Modernization Initiative, A. 24-10-014

new costs.[7] However, to the best of our knowledge the costs of all of these systems are currently either unknown or opaque to stakeholders. While it is intuitive that a common, consistent, and modular data access platform may be more economical than the disparate, inconsistent, and bespoke systems in place or proposed today, current and projected cost data of the status quo is an absolute prerequisite to any fruitful consideration of alternatives. For this reason, we urge the CEC to call for a comprehensive accounting of current and planned data access costs, by the IOUs at least, to provide this critical comparator.

Especially as the benefits of other states' data access system has been formally explored both by the CEC and CPUC, United recommends that the CEC move to the next step in investigating the potential benefits for California by developing and issuing a formal Request for Information. We believe an RFI is the critical next step because an RFI will gather detailed and current information about the capabilities and costs of a potential California system. It is only with such current and tailored information that the CEC and other relevant agencies and stakeholders could compare the costs and benefits of current data access systems to potential alternatives.

b. Device-level performance measurement

Another topic raised during the June 25 workshop that is worthy of further development by the CEC is device-level measurement of load flexibility performance. A variety of DER are capable of performance measurement and telemetry, including battery storage, smart thermostats, smart electrical panels, and electric vehicles and charging equipment. Device-level measurement and telemetry offers rapid, reliable, and accurate measurement and communication of device performance, and obviates the need for more complex, time-consuming, expensive, and approximate load impact assessment methodologies. Device-level measurement and telemetry is already in common use in demand response and Virtual Power Plant programs around the world, and the CEC is already a leader in recognizing the value and benefits of relying on device-level data in the Demand Side Grid Support program.

[7] I.e. the Single Statewide Rate Access Tool required by California Code of Regulation Title 20, Section 1623(c).

Through the recommendations of the 2025 Load Shift Goal Update, the CEC can highlight the opportunity of device-level telemetry and develop a roadmap for integrating device-level telemetry into existing and potential future load flexibility programs. Such a strategy, if implemented, would go a long way to resolving several of the program complexities that workshop participants cited.

c. Program updates and the future of meeting the load-shift goal

United has concerns that the 2022-2024 estimates of existing load flexibility program participation presented at the workshop do not represent the most up-to-date data. Specifically, the estimate provided for the Demand Side Grid Support ("DSGS") program appears quite different from what we understand to be the actual enrolled number. The workshop estimate presented a total of 161MW under the DSGS program, but based on conversations with United members that are DSGS aggregators, that number is likely closer to 800MW. We appreciate the workshop disclaimer that the DSGS estimates are based on a preliminary CEC staff analysis, yet we believe it extremely important that this estimate be updated, especially in the 2025 Load Shift Goal Update with more accurate information that the CEC can gather from DSGS program staff and participants.

DSGS has been one of the most successful scale-ups of DER aggregations, or VPPs, anywhere in the country. Mobilizing hundreds of megawatts of pre-existing DER resources to participate in emergency demand response, through four innovative program designs, is a massive accomplishment of which the CEC should rightfully be proud. Just as importantly, the CEC should accurately reflect the success of this program in order to glean and build on the lessons learned.

First, accurately reflecting the success of the program is important to policymakers right now and in coming months as the budget and future of the program is under debate. Second, any CEC strategy to increase load flexibility going forward must recognize the serious impact that

defunding or discontinuing DSGS will have, as well as the huge opportunity to be realized by adapting the program's success into sustainable structures in the long term.

For these reasons, United recommends the 2025 Load Shift Goal Update include the most up-to-date program estimates possible, an explanation of how a DSGS budget cut would impact meeting California's load shift goal, and a strategy for leveraging the DSGS program success into sustainable models in the long term.

Conclusion

United appreciates the opportunity to submit these comments regarding the June 25 workshop, and more broadly the conclusions and recommendations that the CEC should draw in its 2025 Load Shift Goal Update. While there were a plethora of important insights shared at the workshop, our comments highlight two issues that have strongly and consistently been identified as key opportunities to facilitate and unleash load flexibility, demand response, and VPPs across the state. We encourage the CEC to pursue a) an RFI to investigate a statewide data access platform and b) a roadmap or strategy to utilize more device-level performance measurement and telemetry. Further, we urge the CEC to accurately reflect the success of the DSGS program, and initiate a strategy to ensure that success is not lost to California. United and our member companies look forward to continued collaboration with the CEC to realize the load-shift goal in California.

Signed,

Brian Turner, Director
Advanced Energy United