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Questions and comments on the proposed 2026 DSGS guidelines

Thank you for the opportunity to participate in the program & review/provide comments for the proposed guidelines for the 2026 DSGS season. Olivine ClimateResponse VPP is an aggregator working with Commercial, Industrial, and Residential customers across Options 1, 2, 3 and hopefully Option 4 in the coming year. The following are our questions and comments on the proposed 2026 DSGS guidelines:

1. When will the individual aggregator's revenue cap for Option 3 be shared? Can we expect this cap to be shared in March?
2. From the workshop, we understand that there was a mistake in the guidelines regarding the Option 3 measured baseline, with 10 baseline days selected initially (for weekdays), then 10 days with the highest discharge selected (Chapter 5, Section E.3), making the second selection of baseline days irrelevant. Please correct this so we have a full understanding of the proposed baseline methodology.
3. The current splitting of available Option 3 funds by residential vs. non-residential aggregators seems to unfairly favor residential groups. We suggest splitting the revenue between all aggregators, regardless of customer class, based on the currently proposed methodology for splitting funding by aggregators within customer classes (i.e. what aggregators would have made in Oct. 2025 from the proposed measured baseline). This would reduce administrative burden and make splits between non-residential and residential aggregators more fair.
4. We request that aggregators be notified no later than the end of June of the amount of additional funding that may be allocated for each Option from the 2026-2027 budget process.
5. We request that in the guidelines, the process and review/approval timeline be outlined by which providers should submit a proposal for differing technology types for Option 4. We recommend that approval is confirmed prior to the season start for proposals submitted in March.
6. We suggest that for all aggregators, a standard 5-in-10 baseline be used for Option 3, where for each event hour (for weekday events), 5 days with the lowest discharge out of the previous 10 days are selected as baseline days. Standardizing the baselines across aggregators will help to ease administrative burden.
7. We request to be informed of the amount of capacity enrolled in Option 2 for each month as soon as the monthly enrollments are processed, so we can get an estimate of our earnings during the season. This would allow us to better serve our customers who

are constantly evaluating their participation in DSGS alongside their daily operational activities.

8. In the most recent draft of the guidelines, the total allocated incentive amounts were reduced for Options 2 and 3 but largely left the same for Option 4. It took a substantial period of time to build our aggregations portfolio and trust onsite - without a higher allocation into Options 2 and 3, we will likely lose the participation & trust of many of our customers. We would recommend allocating a higher level of funding to the programs that have kept DSGS successful over the past few seasons, primarily Option 2 which at the current cap is not viable to keep our customers enrolled in.