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LADWP Comments for DEBA DER Solicitation

Additional submitted attachment is included below.

Eligibility of Load Flexibility Enabling Technologies (Section II.B.2)

LADWP supports the explicit inclusion of Load Flexibility Enabling Technologies as eligible zero-emission DERs. Smart thermostats and other HVAC controls, water heater controllers, advanced motor controls such as variable frequency drives, and VGI infrastructure for bidirectional charging are essential tools for scaling reliable demand response programs that deliver incremental load reduction and shifting during extreme events.

We recommend that the final solicitation clarify that these enabling technologies and controls remain eligible when deployed to enhance or automate load flexibility for existing customer equipment (e.g., adding smart controls to existing HVAC or water heaters). This distinction from the ineligible “load-only appliances” category (Section II.B.3) is important to avoid ambiguity and encourage rapid deployment of proven technologies that improve the performance and reliability of utility DR portfolios.

For example, LADWP’s Power Savers demand response program deploys smart thermostats, HVAC controls, and other enabling technologies to automate load flexibility. These technology-driven approaches deliver reliable, measurable capacity during the required program hours and events, rather than relying primarily on occupant behavioral changes. We request confirmation that existing technology-enabled programs, such as the LADWP Power Savers Program, qualify under the Load Flexibility Enabling Technologies category.

LADWP seeks confirmation that Prop 4 DEBA funds may be used to deploy new Load Flexibility Enabling Technologies that expand or enhance existing programs such as Power Savers, provided the project delivers incremental, dispatchable capacity meeting the performance pathway requirements.

LADWP further recommends that the final solicitation explicitly support projects involving new bidirectional VGI infrastructure and export capability deployed through EV Residential and Commercial Charging programs. Bidirectional V2G enables both load reduction and actual energy export to the distribution grid, directly aligning with the solicitation’s goal to increase supply or reduce load during extreme events. We request confirmation that such projects qualify when they deliver new incremental, dispatchable capacity that meets the performance pathway and demonstrated capacity requirements.

Performance Pathways, Dispatch, and Utility DR Integration (Section II.B.5)

LADWP appreciates the flexible performance pathways provided, particularly the broad availability of all four pathways for BTM Load Flex projects. The Market-Aware and Daily Dispatch options are especially relevant for utility-operated or utility-partnered aggregated DR programs. The defined program hours (4:00–9:00 p.m.) and event triggers align well with LADWP’s summer reliability needs during extreme heat and grid stress conditions.

We recommend that the final solicitation provide additional guidance on how existing utility DR dispatch platforms and M&V systems can be leveraged or integrated to meet the “nominated capacity available every day during Program Hours” and demonstrated capacity measurement requirements. Large POUs such as LADWP have established infrastructure for customer notification, dispatch, and performance tracking; duplicative new systems should not be required where equivalent functionality and data quality can be demonstrated.

Clarification of Participation Requirements for Publicly Owned Utilities (POUs) Operating Outside the CAISO

The draft solicitation relies heavily on CAISO market constructs, including locational marginal prices (LMPs), day-ahead market events, and market-based dispatch. While these mechanisms are appropriate for CAISO participants, many POUs operate balancing authorities that are not fully integrated into the CAISO wholesale market.

Although the draft solicitation references non-CAISO balancing authorities (BAs), additional guidance is needed describing how POUs are expected to satisfy Pathway 1 dispatch, program events, such as BA operator directed dispatch that may be used in lieu of CAISO market signals and clarifying how project performance will be measured. Providing equivalent compliance pathways will ensure consistent implementation across all eligible BAs while maintaining the grant's reliability and resilience objectives.

For CAISO resources, the solicitation clearly defines program events using LMP thresholds and Energy Emergency Alerts. For non-CAISO balancing authorities, however, the solicitation states only that market events will be based on host BA load or net-load thresholds.

We recommend providing additional guidance regarding how these thresholds will be established and maintained throughout the program performance period. Clear and consistent program event criteria will improve implementation, reduce uncertainty for applicants, and promote fair evaluation across participating BAs.

Evaluation of Daily Dispatch Performance for Large-Capacity Storage Assets

If a battery is capable of dispatching daily but occasionally experiences operational constraints, how will DEBA assess compliance with Daily Dispatch requirements? Can the Commission clarify how DEBA will evaluate large capacity storage assets within the scoring criteria? Specifically, does the draft solicitation treat utility scale BESS differently in terms of demonstrating incremental reliability capacity, full duration performance, or dispatch compliance during Program Hours (4–9 PM), compared to behind the meter systems?

Fire-Risk Mitigation and Clarification on CEQA/Permitting Scoring Criteria

For the Palisades Rebuild project, LADWP requests clarification on how the DEBA program intends to evaluate battery storage installations located within high fire risk zones. The Palisades region has experienced repeated wildfire activity, and LADWP must incorporate enhanced fire prevention design standards and operational restrictions beyond standard fire safety permitting. Under Section II.B.9, applicants must provide documentation from the local fire marshal regarding permitting status and safety measures. Can the Commission confirm whether additional wildfire risk analysis or mitigation documentation beyond the standard fire safety requirements is recommended or required for DER projects situated in historical fire zones? Furthermore, will projects in fire prone areas be recognized as having elevated reliability need within the scoring criteria for Contribution to Reliability? Can the battery portion be completed earlier than the larger build?

Additionally, LADWP requests clarification regarding Scoring Criterion 3 (Project Readiness). Specifically, does the Commission intend to apply any explicit scoring distinction for CEQA/permitting status beyond the general scoring scale shown in Table 9? LADWP is

currently working on a utility microgrid project with a fully completed local CEQA determination in hand, and we seek confirmation on whether completed CEQA documentation will receive a defined scoring advantage relative to projects with pending CEQA rather than being evaluated solely under the broad qualitative ranges described in the scoring scale.