

DOCKETED

Docket Number:	18-MISC-01
Project Title:	Food Production Investment Program
TN #:	228388
Document Title:	EPRI Comments Importance in considering offsite emissions too for achieving GHG reductions in food production sector
Description:	N/A
Filer:	System
Organization:	EPRI
Submitter Role:	Applicant Consultant
Submission Date:	5/25/2019 8:15:45 AM
Docketed Date:	5/28/2019

Comment Received From: EPRI
Submitted On: 5/25/2019
Docket Number: 18-MISC-01

Importance in considering offsite emissions too for achieving GHG reductions in food production sector

To achieve the carbon emissions reduction goal of the food production investment program, it is important to also include consideration of offsite emissions reduction enabled by flexible Demand Response, which may be achieved through adjustment of grid-purchased power to avoid renewable curtailment on the grid. By absorbing renewable generation including during times of over-generation in bulk power and market systems, the food production sector can operationally support deeper emissions reductions than considering just onsite emissions. EPRI has studied and shown a correlation between negative wholesale market pricing and occurrences of renewable curtailment, so that published CAISO negative prices may generally indicate potential to mitigate curtailment of zero carbon resources that may otherwise have been run in coordination with Flexible loads. Therefore, it is recommended that future solicitations include mention of favorable consideration of proposals that also address offsite emissions. EPRI is currently drafting a to-be-published study on wholesale market negative prices and Flexible Demand Response, under EPRI's Flexible Demand Response Collaborative, and has offered to present targeted findings from this work to interested commission staff.