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Amended Polaris Energy Services comments on Load Management Standards Draft Analysis

Polaris Energy Services amends its comments as follows:
1. AutoDR incentives should be available to customers who respond to dynamic pricing tariffs authorized under this proceeding.
With years of effort and investment by California in technology and standards, the AutoDR program helps end users to deploy controls that enable loads to respond to signals from the grid. As currently constituted, however, the incentives offered for automation REQUIRE that recipients maintain high levels of peak usage in order to then curtail that load during infrequent DR events. The incentives cannot be used to automate load shift based on Time of Use price signals and, without regulatory action, will not be available to automate load shift in response to dynamic prices that are published based on this proceeding. Polaris recommends that the standards address this dissonance and, whether independently or in collaboration with the CPUC, direct that AutoDR incentives be made available to customers that respond to dynamic tariffs.

2. IOUs request to be "given time" for pilots etc.: Polaris recommends that requests to slow this process be rejected.
While we cannot divine intent, studies and pilots have the effect of 'kicking the can down the road' when our state and country have determined that we can ill afford to do so. These comments relate specifically to PG&E and Agricultural Irrigation customers. In the CPUC Reliability proceeding, PG&E rebuffed proposals to make simple program modifications that would significantly increase participation in existing programs by leaning on an "Ag DR Study" that it planned to conduct. After embarking on that study, PG&E reached the highly predictable conclusion that it would not be able to implement the intended pilot program in 2021 in the time available, meaning that the overarching goal of the reliability proceeding--to get more load for 2021--was abandoned. Instead, it plans to "study" the subject and has not committed to conducting a pilot in 2022 either, after which the results of the "study" will be incorporated in the next program cycle. Similarly, while PG&E proposed a RTP pilot in its 2020 General Rate Case Phase II, it does not plan a pilot for agriculture but only "rate design research." This means that for one of the two largest flexible resources in the state--irrigation pumping--there is NO program or pilot planned or intended by PG&E. No time should be given for pilots when there ARE NO pilots!

3. Previous research: IOUs should be required to build on ratepayer-funded research. Many of the questions slated to be answered by the pilots and studies for which the IOUs request that this process wait have been addressed in research, including EPIC agreements. It not only slows progress toward our policy goals to replicate that research but requires ratepayers to pay twice or more for the same work. For example, TeMix and Universal Devices conducted a successful dynamic pricing (Transactive Energy)

pilot for residential and commercial customers in collaboration with SCE and Polaris conducted a successful dynamic pricing (Transactive Energy) pilot with PG&E agricultural customers. At a minimum, when asking to conduct studies and pilots before implementing tariffs and programs, IOUs should be required to specify what the existing body of research and pilots has concluded and what questions remain unaddressed that require them to interject additional studies and pilots before wide-scale implementation. Even better would be to rely on CEC for R&D with IOUs focused on implementation.