

**DOCKETED**

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## Stakeholder Comments Template - Proposed Consolidation of Principles

**Submit comments to:** [Tom.Flynn@energy.ca.gov](mailto:Tom.Flynn@energy.ca.gov)

**Comments are due October 1 by 5:00 p.m.**

All comments received will be posted to CEC Docket 21-DR-01

Instructions: CEC staff is requesting stakeholder comments on the set of nine principles retained, combined, and/or reworded based on stakeholder discussion during the Principles WG meetings held on September 13 and 27. This discussion also resulted in some principles being dropped.<sup>1</sup> Each proposed principle is followed by three questions; please provide a response to each question, as applicable, in the space provided. Toward the end of this comments template, CEC staff is requesting comments, as applicable, in two other areas.

### **Comments on the refined set of principles**

- I. Principles #1, #5, #11 combined – **“The QC methodology, including ex-post performance measurement, should be transparent, replicable, and understandable.”**
  - a. Indicate whether your organization supports the principle as worded, would require changes to support, or opposes the principle. Response: **Support**
  - b. If your organization would require changes to support, what changes would your organization suggest? Response: **N/A**
  - c. Explain your organization’s support or opposition of this principle. Response: **Clarity and transparency are admirable goals, subject to applicable confidentiality requirements.**

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<sup>1</sup> Principles #4, #7, #13, #14, #15, #16, #17, #18, #20, #21, #22 were dropped based on stakeholder discussion.

- II. Principles #2, #3 combined – **“The QC methodology should be forward-looking and use the most current information regarding resource capabilities, including historical performance data where possible.”**
- a. Indicate whether your organization supports the principle as worded, would require changes to support, or opposes the principle. *Response: **Support***
  - b. If your organization would require changes to support, what changes would your organization suggest? *Response: **N/A***
  - c. Explain your organization’s support or opposition of this principle. *Response: **SCE supports this principle. Past actual performance is the best indicator of future performance for existing resources/programs. However, it is critical to account for enrollment forecasts and any changes to program design that impact performance expectations going forward.***
- III. Principle #6 – **“The QC methodology should be sufficiently fast and easy to update to enable DR providers to participate in all capacity solicitations.”**
- a. Indicate whether your organization supports the principle as worded, would require changes to support, or opposes the principle. *Response: **Support with changes***
  - b. If your organization would require changes to support, what changes would your organization suggest? *Response: **Replace ‘fast and easy’ with ‘straightforward and more clearly define what needs to be “fast” or “straightforward”’. Also, change “participate in all capacity solicitations” to “facilitate transactions”.***
  - c. Explain your organization’s support or opposition of this principle. *Response: **We are unclear on why the “methodology” needs to be fast. Do you mean that the process of determining a resource’s QC (with this new methodology) should be a quick process?***
- IV. Principle #8 – **“The QC methodology should be compatible with individual DR resources and aggregations of resources.”**
- a. Indicate whether your organization supports the principle as worded, would require changes to support, or opposes the principle. *Response: **Support***
  - b. If your organization would require changes to support, what changes would your organization suggest? *Response: **N/A***
  - c. Explain your organization’s support or opposition of this principle. *Response: **Agree that the QC methodology should be flexible enough to be used for DR at any quantity of MW or customers.***

- V. Principle #9 – **“The QC methodology should be consistent and compatible with the RA program.”**
- a. Indicate whether your organization supports the principle as worded, would require changes to support, or opposes the principle. *Response: **Support***
  - b. If your organization would require changes to support, what changes would your organization suggest? *Response: **N/A***
  - c. Explain your organization’s support or opposition of this principle. *Response: **Agree that consistency and compatibility with the RA program are essential to this process.***
- VI. Principle #10 – **“The QC methodology should account for all factors that substantially influence DR variability.”**
- a. Indicate whether your organization supports the principle as worded, would require changes to support, or opposes the principle. *Response: **Support with changes, see response to principle #12.***
  - b. If your organization would require changes to support, what changes would your organization suggest? *Response: **Include, “It would consider different loss of load expectation (LOLE) between day types (i.e., weekdays versus weekends).”***
  - c. Explain your organization’s support or opposition of this principle. *Response: **It makes sense to take into account variations in weather, season or customer type when determining QC.***
- VII. Principle #12 – **“The QC methodology should account for the use-limited, availability-limited, and variable-output nature of DR.”**
- a. Indicate whether your organization supports the principle as worded, would require changes to support, or opposes the principle. *Response: **Support with changes***
  - b. If your organization would require changes to support, what changes would your organization suggest? *Response: **Recommend potentially combining this with principle #10: “The QC methodology should account for all factors that substantially influence DR variability including use-limitations, availability limitations and the variable nature of DR.”***
  - c. Explain your organization’s support or opposition of this principle. *Response: **Combining with principle #10 would be more efficient.***
- VIII. Principle #19 – **“The QC methodology should accurately account for DR’s contribution to reliability.”**

- a. Indicate whether your organization supports the principle as worded, would require changes to support, or opposes the principle. *Response: **Support***
  - b. If your organization would require changes to support, what changes would your organization suggest? *Response: **N/A***
  - c. Explain your organization's support or opposition of this principle. *Response: **Accuracy is good and this should result in DR being more appropriately valued.***
- IX. Principle #23 – **“The QC methodology should, to the extent possible, rely on software or code that is available at nominal cost to DR providers.”**
- a. Indicate whether your organization supports the principle as worded, would require changes to support, or opposes the principle. *Response: **Oppose***
  - b. If your organization would require changes to support, what changes would your organization suggest? *Response: **N/A***
  - c. Explain your organization's support or opposition of this principle. *Response: **Simplicity is already captured in Principle III.***

**Comments about principles not included**

Please provide any comments concerning principles that your organization believes are missing from the refined set of principles.

*Response: **N/A***

**Any additional comments**

Please provide any additional comments that your organization would like to make.

*Response: **N/A***