

**DOCKETED**

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## **CALSSA Comments on Load Management Standards**

*Additional submitted attachment is included below.*



February 7, 2022

California Energy Commission  
Docket Unit  
715 P Street, MS-4  
Sacramento, CA 95814

Re: Docket No. 21-OIR-03—Comments on Proposed Amendments to Load Management Standards

California Energy Commissioners and Staff:

The California Solar & Storage Association (CALSSA) appreciates the opportunity to submit comments on the Commission's proposed amendments to the Load Management Standards contained in Title 20 of the California Code of Regulations.

CALSSA represents over 700 clean energy businesses serving over three million California energy users, and advocates for policies to expand the benefits of clean energy to all Californians. CALSSA supports and pursues policies that increase the ability of distributed energy resources, particularly behind-the-meter (BTM) storage and solar + storage hybrid systems, to have greater value to California's grid.

Policy development to increasingly enable BTM storage devices to respond to market and program signals will be a key element in unlocking the full potential of this resource to serve the California grid. These resources can be important tools for load management with a renewable energy-based grid.

CALSSA strongly supports the CEC's work to increase statewide demand flexibility, including through this rulemaking and through development of its Market Informed Demand Automation Server (MIDAS) database. MIDAS offers significant potential for the use of automation tools to enable fleets of distributed resources to participate seamlessly in grid services. By increasing the flexibility and functionality of distributed energy resources and smart appliances, the Load Management Standards and MIDAS will advance the transition toward a clean energy electricity sector and economy.

A large part of the benefit from the CEC's approach in adopting the amendments to the Load Management Standards is ensuring robust participation by load-serving entities. To that end, we support the proposal to make development of rate structures mandatory for the large electric utilities.

Additionally, the proposed rules include provisions for exemptions, delays, and modifications from the proposed requirements of Sections 1621 and 1623. To ensure that the aims of the Load Management Standards amendments are not undermined, the CEC regulations should require a strong showing in support of applications for exemptions, delays, and modifications.

There are multiple benefits to establishing a consistent approach and standard protocols across all load-serving entities. The CEC should also consider expanding the application of the Load Management Standards to include smaller utilities, including publicly owned utilities (POUs) that develop Integrated Resource Plans under SB 350. While mandatory treatment may not be appropriate for these POUs, it is in the interest of the state to encourage them to adopt programs and rate structures that encourage load shifting away from peak hours and into periods when renewable energy generation is high.

The Load Management Standards as amended include several provisions that POUs should be encouraged to pursue. These include publication of machine-readable rates and uploading into the MIDAS database; adoption of the statewide standard tool for rate data access by third parties (to be developed by the major electric utilities pursuant to proposed Section 1623(c)) together with the work needed to make that tool compatible with their systems; and development of programs and dissemination of information to encourage mass-market automation of load management as set forth in proposed Section 1623(d).

We believe that the MIDAS database holds promise that can go far beyond holding time-dependent rates. For this reason, we commend the inclusion of load flexibility programs in proposed Section 1623(d). Programs can be useful tools for achieving load flexibility, and their inclusion in MIDAS, should be pursued concurrently with rate-based signals. Accordingly, we recommend that utilities be required to include cost-effective load flexibility programs (including, but not limited to, demand response programs) among the offerings for which MIDAS-enabled customer and third-party access is made available, instead of such programs being included only if no marginal cost rate has been developed and approved in the prescribed time frame. We also believe a shorter time frame is appropriate for inclusion of existing cost-effective load flexibility programs, and we recommend that proposed Section 1623(d)(3) be clarified that public information programs should inform customers about the need, use, and bill savings of load flexibility programs as well as of marginal cost-based rates and automation.

CALSSA appreciates the opportunity to provide these comments and recommendations regarding the Load Management Standards amendments. We look forward to working with the CEC as its work continues to promote load flexibility, a standardized data portal through MIDAS, and development of tools to enable third-party aggregators and automation service providers to more fully realize the substantial potential of BTM storage and other distributed energy resources to implement advanced load management strategies.

Sincerely,

/s/

Kate Unger  
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California Solar & Storage Association