

DOCKETED

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LADWP Comments for the DSGS Program Proposed Guidelines

Additional submitted attachment is included below.

Deana & Ashley,

Here are our comments for your review:

- The CEC should consider allowing our customers dual participation (both DSGS and Utility's program) to avoid competing.
 - When the events coincide, the utility's program will take precedent over DSGS.
- Remove penalty from Option 3: Capacity Payment and Bid Structure to encourage more participation.
 - After the program is mature, penalty may be implemented.
- LADWP calculates the total reimbursement at the end of the season, so can LADWP submit the reimbursement claim for the whole season at the end of the season?
 - If monthly claim is required, 20% of incentive for admin cost (instead of proposed 10%) will better recover LADWP's cost.
- Allowing diesel and gas resources to be brought in during the events might attract negative attention and this is contradictory to the green LA efforts. Also, this might raise issues with AQMD locally.
- How can customers without cogens participate in the program? If PPA is required for the customers, what are the requirement from CEC? Is LADWP DR application/agreement qualified as PPA?

Best Regards,



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