

**DOCKETED**

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# RECURVE

**Comments:** October 17, 2022

**CEC Docket:** [21-DR-01](#)

**Project Title:** Supply Side Demand Response - Qualifying Capacity Working Group

Recurve is an industry leader in meter-based demand flexibility. Recurve provides transparent, accessible analytics to track changes in consumption and demand due to program interventions for both individual buildings and in aggregate to support resource planning and facilitate performance-based transactions.

Recurve has been attending the CEC stakeholder working group meetings on qualifying capacity since they were initiated last fall. We support the theme of improved predictability of QC predictions and alignment of performance settlement but the solutions available continue to seem fragmented. Therefore we will only comment generally on our support for reform, or possibly elimination of, the Load Impact Protocols.

We support OhmConnect's proposal for significant modification of the Load Impact Protocol process to increase transparency and streamline the process. State agencies may also want to consider exemptions from using the LIP if a provider uses settlement methods that are aligned with meter-based performance and include robust baselining and comparison group practices. In those cases, the incremental need for the LIP would be limited to inclusion of simple forecasting parameters for future performance like number of customers, future weather conditions, etc. The ultimate goal for QC and performance payments should be closer alignment, accountability and transparent repeatable methods that reflecting a shared agreement on what performance and value to the system.

We support opportunities for third party demand response providers to be able to expand their ability to provide grid resources. In the current processes, third party demand-response providers face much higher barriers to participation given their limited access to the most reliable performance methods (given restrictive interpretations of data access rules), no mechanism of rate recovery or public funding mechanisms to pay for a LIP reports. In short, they have to pay out of pocket for performance assessments and are blocked from using best-in-class methods like comparison groups in the current structure.

Recurve supports the adoption of methods (including baselines) that can be widely applicable across state agencies and market sectors and deliver consistently comparable results. As noted in our [February comments](#), research conducted with CAISO demonstrates viable approaches that could be used at scale to offer a common view of performance.<sup>1</sup>

We appreciate the opportunity to participate in the stakeholder process to continue to build a scalable solution for demand side resources to contribute to grid operations.

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<sup>1</sup> The full report is available here: [Demand Response Advanced Measurement Methodology Analysis of Open-Source Baseline and Comparison Group Methods to Enable CAISO Demand Response Resource Performance Evaluation](#). Recurve, 2021.