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## **PG&E Responses to RFI on Clean Energy Resources for Reliability, Input on DEBA Program**

PG&E submitted written comments to the CEC on the Clean Energy Resource for Reliability on November 10, 2022. Submitted comments in link:  
<https://efiling.energy.ca.gov/GetDocument.aspx?tn=247406&DocumentContentId=81795>.

To respond to this RFI, PG&E focused on the DEBA Program in the attached document but would also call attention to the previously submitted comments.

*Additional submitted attachment is included below.*



Licha Lopez  
CEC Liaison  
State Agency Relations

1415 L Street, Suite 280  
Sacramento, CA 95814  
(202) 903 4533  
[Elizabeth.LopezGonzalez@pge.com](mailto:Elizabeth.LopezGonzalez@pge.com)

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California Energy Commission  
Energy Research and Development Division  
David Erne - Deputy Director  
Clean Energy Resources for Reliability  
Docket Number 21-ESR-01  
715 P Street  
Sacramento, CA 95814

**Re: Pacific Gas and Electric Company’s Response on Clean Energy Resources for Reliability (Docket Number 21-ESR-01)**

Pacific Gas and Electric Company (PG&E) supports the California Energy Commission’s (CEC) efforts to launch the Distributed Electricity Backup Assets (DEBA) program, pursuant to Assembly Bill (AB) 205, and appreciates the opportunity to provide feedback on the development of the DEBA program under the Request for Information (RFI) released by the CEC on November 3, 2022. In this response, PG&E provides guiding principles for the design of the DEBA program (Section I) and responds to the specific questions posed by the CEC in its RFI document (Section II).

**I. PG&E’s Recommended Guiding Principles for the DEBA Program**

PG&E’s comments focus on the following guiding principles, which are further explained in Section II in response to the four specific questions posed by the CEC in its November 3, 2022 RFI document:

- Encourage load shifting outside of emergency events to reduce net peak electrical demand in support of the load shifting targets that will be adopted pursuant to Senate Bill (SB) 846;
- Prioritize connected technologies that enable utilities and third-parties to optimize energy use;
- Consider how the program will interact with existing ratepayer-funded programs; and
- Use meter-based measurement and verification (M&V) approaches to provide timely, verifiable feedback on program impacts.

**II. PG&E’s Responses to the Questions in the DEBA Program RFI Document**

**1- What size of resource and what types of customers should the program target?**

PG&E recommends that the DEBA program design be flexible to accommodate all resource sizes and customers and recommends that the CEC consider targeting customers and resources/technologies that provide resilience during public safety power shutoffs (PSPS)-related events, and/or provide resilience for other wildfire mitigation efforts impacting reliability (such as the Enhanced Powerline Safety Settings

(EPSS) program), as well as on-call emergency supply for the state's electrical grid during extreme events.<sup>1</sup>

## **2- What types of incentive structures and amounts are needed to accelerate the development and deployment of this resource?**

While PG&E does not have specific recommendations on the amount of incentives that may be required at this time, PG&E recommends that the incentives support value streams that distributed energy resources (DER) can provide beyond the amount of load reduction during an emergency event. For example, the CEC could:

- Enable programs proposed under PG&E's Clean Energy Financing Options (CEFO) proposal<sup>2</sup> in the California Public Utilities Commission (CPUC) instituting Rulemaking 20-08-022. The CEFO platform would enable implementers to offer customers no money down, turnkey installations through programs. The CEC incentive funding would be a program inflow under the State subsidies contemplated under the proposal. Enabling these incentives could accelerate the development of avoided costs, which can further accelerate deployment.
- Provide incentives that focus on emerging technologies that could enable longer-term market transformation.
- Prioritize the incremental costs of connected technologies and automation that allow utilities and third-parties to optimize a customer's energy use across multiple devices. This could also include incentivizing panel upgrades and other ancillary needs that may be required to support connected technologies. For instance, a customer may be interested in installing an energy storage system but may ultimately be discouraged by the need to pay for additional improvements to accommodate the system.
- Require customers to enroll in complementary load management programs to receive an incentive *or* design incentive structures to bundle offerings that may currently be available to customers across various ratepayer-funded programs. This approach would mitigate existing barriers associated with dual participation, provide stackable grid benefits, and support affordability by maximizing the use of DEBA program funding rather than supporting these activities through utility rates.

## **3- What types of conditionalities and measurement and verification requirements should the program include to ensure funded resources participate and deliver during emergency events?**

Reliable measurement and verification (M&V) are required to ensure that load management resources are included in short-and long-term forecasts. PG&E believes that the use of revenue quality meter-based M&V approaches is critical to ensure that participating customers are included and deliver during emergency events. Meter-based M&V promotes accountability by providing timely, verifiable feedback on how a customer performed when called to act.

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<sup>1</sup> See Public Resources Code 25791(a) and (b)(2) indicating that the DEBA program incentivize the construction of cleaner and more efficient energy assets that would serve as on-call emergency supply and shall allocate moneys for the deployment of new zero- or low-emissions technologies, including, not limited to, fuel cells or energy storage, at existing or new facilities.

<sup>2</sup> PG&E [CEFO Proposal 4/15](#) and [CEFO Revision 6/15](#).

**4- In general, please provide any specific proposal or recommendation on the design and implementation of the DEBA program.**

In addition to the recommendations provided above, PG&E recommends that the CEC coordinate the implementation of the DEBA program with the CPUC to ensure that the program launch and any modifications throughout the duration of the program align with activities in related CPUC proceedings to enable complimentary programs and prevent, among other things, programs from competing for customers, incentivizing conflicting customer behaviors, or double compensation for the same behavior/technology.

**III. Conclusion**

PG&E appreciates the opportunity to provide comments and recommends that the CEC leverage the guiding principles in section I to guide future discussions on the development of the DEBA program. PG&E looks forward to working with the CEC and other state agencies to ensure that the DEBA program supports reliability during emergency events while also contributing to load management strategies that help shape loads, reduce net peak electrical demand, and/or provide enhanced resilience to customers.

Please reach out to me with any questions.

Sincerely,

Licha Lopez