

**DOCKETED**

<b>Docket Number:</b>	22-RENEW-01
<b>Project Title:</b>	Reliability Reserve Incentive Programs
<b>TN #:</b>	250133
<b>Document Title:</b>	Southern California Gas Company Comments - SoCalGas Comments on CEC Demand Side Grid Support (DSGS)
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Southern California Gas Company
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	5/11/2023 5:06:36 PM
<b>Docketed Date:</b>	5/12/2023

*Comment Received From: Southern California Gas Company  
Submitted On: 5/11/2023  
Docket Number: 22-RENEW-01*

**SoCalGas Comments on CEC Demand Side Grid Support (DSGS)**

*Additional submitted attachment is included below.*



Kevin Barker  
Senior Manager  
Energy and Environmental Policy  
555 West 5<sup>th</sup> Street  
Los Angeles, CA 90013  
Tel: (916) 492-4252  
*KBarker@socalgas.com*

May 11, 2023

Deana Carrillo, Director  
Reliability, Renewable Energy & Decarbonization Incentives Division (RREDI)  
California Energy Commission  
Docket Unit, MS-4  
Docket No. 22-RENEW-01  
715 P Street  
Sacramento, CA 95814-5512

**Subject: Comments on the Staff Workshop on the Demand Side Grid Support Program**

Dear Ms. Carrillo,

Southern California Gas Company (SoCalGas) appreciates the opportunity to provide comments to the California Energy Commission (CEC) regarding the Demand Side Grid Support (DSGS) program's draft revised guidelines, which were presented during the workshop on April 26, 2023.

Climate change is creating significant issues on the reliability of our energy systems, and SoCalGas commends the CEC for incentivizing solutions. Shortfalls of electricity and the proliferation of diesel backup generators call for programs like DSGS to maintain a reliable electric grid while combating climate change, and all programmatic options should be on the table. **The CEC proposes to expand the eligibility pool of DSGS providers, and we respectfully ask that you expand DSGS provider eligibility to gas utilities.** SoCalGas has been working with several of our customers to provide natural gas with the intent to phase in renewable natural gas (RNG) and, ultimately, renewable hydrogen for electricity generation. These projects will help support battery electric vehicle charging, especially fleets, considering California Air Resources Board's (CARB) adopted Advanced Clean Fleets (ACF) rule, reduce or remove diesel backup generators at hospitals, and bolster resiliency for wastewater treatment facilities. **We understand that the Distributed Electricity Backup Assets Program (DEBA) guidelines have yet to be released, but we request opening eligibility of that program to gas utilities as well.**

Respectfully,

*/s/ Kevin Barker*

Kevin Barker  
Senior Manager  
Energy and Environmental Policy