

DOCKETED	
Docket Number:	23-LMS-01
Project Title:	Load Management Standards Implementation
TN #:	252224
Document Title:	Boris Prokop Comments - Clarification Implementation Assistance related to impact projections
Description:	N/A
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Comment Received From: Boris Prokop
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Clarification Implementation Assistance related to impact projections

See attached file

Additional submitted attachment is included below.

Comments by Boris Prokop, boris@borismetrics.com

The following are comments related to the following:

Docket Number:	23-LMS-01
Project Title:	Load Management Standards Implementation
TN #:	251054
Document Title:	Compliance Assistance for Load Management Standards Compliance Plan Submittals

On page 14.

6. 1623.1(a)(1)(B) Description of MIDAS-based hourly marginal signal programs (if applicable)

a) Hourly-MIDAS signals-based **load flexibility** programs

i. Description of current and/or proposed programs:

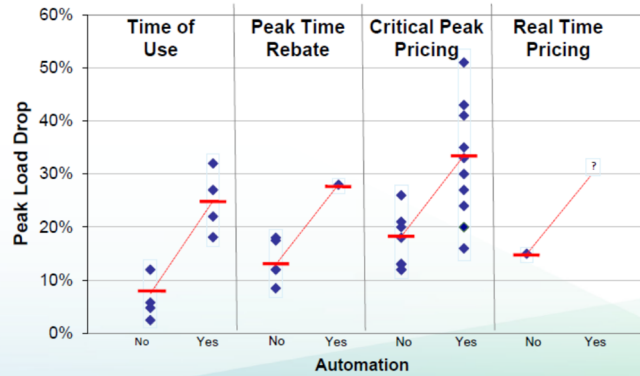
- A. types of hourly MIDAS signals
- B. target end-uses/customers
- C. equipment requirements
- D. participating third-party automation service providers, if applicable
- E. control algorithms
- F. enrollment projections
- G. **load impact projections**

1. Can non-MIDAS programs such as direct load control be considered load flexibility programs? If yes, can such programs be substituted for MIDAS signal based programs if the non-MIDAS programs are technically viable and more cost-beneficial than MIDAS based programs.
2. What information does the CEC have pertaining "load impact projections"? For example, in a CEC power point presentation titled "2020-05-27 Herter (CEC) - 2020 Load Management Rulemaking", some information is shared on possible load reductions from real time pricing.

The graphic, "Peak Electricity Saving by Rate Type" below is presented. The far right part of the graphic displays one study related to real time pricing without automation. What is the source of this study? A source for the whole graphic is listed as "Herter 2010" which is not listed on the page titled "Additional Information" in power point. Outside this CEC power point what other studies does the CEC that could assist with load impact projections.? Are there any California pilots similar to the LMS scope as to Peak Price elasticities or Peak Reductions?

Peak Electricity Savings by Rate Type

U.S. Residential and Small Commercial Pilots 2000-2010



Source: Herter 2010



For more information

- CEC staff contact
 - Karen.Herter@energy.ca.gov
- CEC Standards
 - [2020 Load Management Rulemaking Docket 19-OIR-01](#)
 - [2020 Load Management Rulemaking website](#)
 - [Load Management Standards: CCR Title 20 §1621-1625](#)
 - [Flexible Demand Appliance Standards: PRC 25402](#)
 - [Warren-Alquist Act: PRC 25403.5](#)
- Technology Demonstrations and Pilots
 - [LBNL 2009, Residential OpenADR to FM broadcast demonstration](#)
 - [LBNL 2010, Small Business OpenADR to FM broadcast pricing pilot](#)
 - [PGE 2016, FM broadcast to CTA-2045 water heater case study](#)
 - [BPA 2018 FM broadcast to CTA-2045 water heater study](#)
- Other
 - [CEC 2003, Feasibility of Implementing Dynamic Pricing in California](#)

2020 Load Management Rulemaking

Statewide Market-Influenced Demand Automation System (MIDAS)



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