

DOCKETED

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Recurve Comments on DSGS Modifications

Dear CEC Staff,

Thank you for your consideration of the attached comments on modifications to the DSGS program.

Best regards,

Julian Gibson

Additional submitted attachment is included below.

Re: Comments on the Modification of Demand Side Grid Support Program Guidelines

The California Energy Commission (“CEC”) has requested comments in response to the Demand Side Grid Support (“DSGS”) workshop on January 23, 2024. Recurve thanks the CEC for this opportunity to offer comments to inform the approach to maximizing the reliability benefits of the DSGS program to the California grid.

Recurve is an industry leader in meter-based demand flexibility. Recurve tracks changes in energy consumption resulting from program interventions for both individual buildings and in aggregate to support resource planning and facilitate performance-based transactions. We encourage and support market-based solutions for decarbonization.¹

Recurve’s software platforms are grounded in open-source methods and code. Open-source methodologies, software, and collaboration are key to developing the foundational weights and measures required to scale demand flexibility as a reliable energy resource. If you have questions about these comments, please contact me with the information in my signature block.

Recurve finds the CEC's proposed revisions to the DSGS program reasonable, and we suggest further modifications related to participant enrollment verification, consumption baselines, and program settlements as outlined in our comments.

We look forward to working with the CEC and other stakeholders as the DSGS program grows and evolves.

Respectfully submitted,



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¹ M. Golden, A. Scheer, C. Best. Decarbonization of electricity requires market-based demand flexibility, The Electricity Journal Volume 32, Issue 7, August–September 2019, 106621 Available at: <https://www.recurve.com/blog/the-secret-plan-for-decarbonization-how-demand-flexibility-can-save-our-grid>

What additional potential program modifications should be considered?

- Recurve supports the modifications suggested by the CEC in the January 23, 2024, workshop related to reporting and claims requirements. We also support the change to Option 1 dispatch to limit DSGS participant response to only Energy Emergency Alerts (EEAs) by the host Balancing Authority to support local reliability as efficiently as possible through the program.
- Recurve proposes to track program participants by their service addresses as defined in the United States Postal Service Application Programming Interface to provide utility-meter level settlement information for computing program impacts.
- Regarding the measurement and verification methodology for DSGS program results for years 2025 and beyond, Recurve supports the use of thermostat runtime data to verify event participation. CEC could utilize existing comparison group methods demonstrated by Recurve in partnership with CAISO². With available data infrastructure, the CEC and CAISO could utilize advanced measurement methods to compute actual achieved savings for DSGS.
- Recurve supports the proposal to require a minimum average of one dispatch per month from July to September and an average of one dispatch per month across the program season, including one dispatch of three hours as a means of offering flexibility to DSGS providers in how they dispatch and to ensure that dispatch coincides with the periods of greatest stress to the grid.

What are the barriers to enrollment and participation for both providers and participants?

- Data access continues to impede the streamlined implementation of demand-side solutions. In particular, the "click-through" regulatory process has not enabled efficient enrollment and participation. With its available data infrastructure, the CEC can now support a significant leap in facilitating click-through access to promote maximal participation of resources and support grid reliability.
- Recurve supports the CEC's proposal to mitigate double compensation of energy resources. The CEC could provide administrative and budgetary support to ensure that resources are not compensated erroneously.

² See [CAISO Demand Response Baseline Enhancements](#) 2021 initiative; [Letter](#) releasing the report; and the full report [Demand Response Advanced Measurement Methodology - Updated - Feb, 2022](#)

What is a reasonable deadline for submitting incentive claims to ensure timely reporting of performance while providing sufficient time to providers and participants to gather the necessary data?

- Program efficiency is maximized by the timely calculation and settlement of incentive claims. A deadline for submitting incentive claims of 90 days would serve the best interests of program outcomes.