

**DOCKETED**

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*Comment Received From: PowerFlex Inc  
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**PowerFlex Comments\_DSGS Workshop**

*Additional submitted attachment is included below.*



February 5, 2024

California Energy Commission  
Docket Unit, MS-4  
715 P Street  
Sacramento, CA 95814

**Re: Docket No. 22-RENEW-01—PowerFlex Comments on January 23, 2024 Demand Side Grid Support Program Workshop**

California Energy Commissioners and Staff:

PowerFlex appreciates the opportunity to comment on the California Energy Commission's (Commission's) January 23, 2024 Demand Side Grid Support (DSGS) workshop (workshop). PowerFlex was very supportive of creating DSGS Option 3 and participated six sites comprising over 3 MW of battery capacity in that option in 2023. With this experience, PowerFlex offers the following comments on the Commission's proposed changes for the 2024 season.

**Include Electric Vehicle-to-Building or Grid (V2X)**

PowerFlex strongly supports the Commission's proposal to include vehicle-to-building or grid (V2X) resources in Option 3. PowerFlex agrees with the Commission that V2X resources should measure performance on how the resources discharge during events without using baselines and that resources should be measured at the device level, as battery storage is currently treated in Option 3. PowerFlex believes that allowing V2X resources to participate in DSGS Option 3 will encourage these resources to respond to events and provide reliability to the grid, unlocking massive potential for bidirectional vehicles to provide grid services in the coming years.

**Greater Program Certainty**

PowerFlex would also support the Commission providing greater transparency around program budget availability and duration. Participants have to make difficult decisions regarding whether and which programs to enroll in and undertake considerable administrative and operational effort to do so. Therefore, it is important for current and potential participants to have confidence that the program will be funded for a reasonable duration and, if not, when allocated funding may lapse. More broadly, PowerFlex urges the Commission to remove the "pilot" designation from DSGS and make it a more permanent program fixture. This will catalyze the hard work of the Commission and contributing stakeholders who have created what PowerFlex believes to be an effective program design.

**Day-Of Event Triggers**

PowerFlex does not support including day-of event triggers in the 2024 program year, as proposed by the Commission. While PowerFlex understands the importance of having day-of resources available to provide grid reliability, this is a complex issue that requires more development before being implemented, especially given the tight deadline for 2024 program changes.

Rather than including day-of triggers in the 2024 season, PowerFlex recommends that the Commission seek to develop and refine this proposal throughout 2024 for consideration in the 2025 season or after. This would give stakeholders more opportunity to work with the CEC to shape the details around day-of event participation, such as resource compensation and event time windows..



Additionally, in developing the proposal of a day-of trigger, PowerFlex recommends that day-ahead and day-of events be separate options and that customers/aggregators can choose which option to enroll in. Rules unique to day-ahead and day-of events should be considered and treated independently in their own enrollment options.

PowerFlex appreciates the opportunity to provide these comments in response to the Commission's January 23, 2024 workshop and looks forward to collaborating with the Commission on this topic in the future.

Respectfully,

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PowerFlex Inc.