

**DOCKETED**

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Submitted On: 2/5/2024  
Docket Number: 22-RENEW-01*

**Comments on January 23, 2024, Staff Workshop on DSGS Program**

*Additional submitted attachment is included below.*

**BEFORE THE ENERGY COMMISSION  
OF THE STATE OF CALIFORNIA**

In the matter of:	)	Docket No. 22-RENEW-01
	)	
<i>Reliability Reserve Incentive Programs</i>	)	LADWP Comments Re: January
	)	23 <sup>rd</sup> Staff Workshop on the
	)	Demand Side Grid Support
	)	Program

**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER TO THE  
CALIFORNIA ENERGY COMMISSION ON THE JANUARY 23, 2024 STAFF WORKSHOP ON  
THE DEMAND SIDE GRID SUPPORT PROGRAM**

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Dated: February, 5, 2024

**BEFORE THE ENERGY COMMISSION  
OF THE STATE OF CALIFORNIA**

In the matter of:	)	Docket No. 22-RENEW-01
	)	
<i>Reliability Reserve Incentive Programs</i>	)	LADWP Comments Re: January
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**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER TO THE  
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**INTRODUCTION**

The Los Angeles Department of Water and Power (“LADWP”) appreciates the opportunity to provide comments to the California Energy Commission (“Commission”) regarding the Demand Side Grid Support (“DSGS”) Program staff workshop held on January 23, 2024.

The City of Los Angeles (“City of LA”) is a municipal corporation and charter city organized under the provisions set forth in the California Constitution. LADWP is a proprietary department of the City of LA, pursuant to the Los Angeles City Charter, whose governing structure includes a Mayor, a fifteen-member City Council, and a five-member Board of Water and Power Commissioners (“Board”). LADWP is the third largest electric utility in the state, one of five California Balancing Authorities, and the nation’s largest municipal utility, serving a population of over four million people within a 478 square mile service territory that covers the City of LA and portions of the Owens Valley. LADWP exists to support the growth and vitality of the City of LA, its residents, businesses and the communities we serve, providing safe, reliable and cost-effective water and power in a customer-focused and environmentally responsible manner.

As LADWP works toward 100% clean energy, LADWP has launched several distributed energy resource and demand response programs to achieve our renewable energy goals. While LADWP continues to meet and exceed renewable energy requirements and goals, it has also been a reliable partner to the State and neighboring utilities by being in a position to export energy to the grid during critical periods. LADWP remains committed to clean energy while continuing to provide bulk grid support during State emergencies.

## SPECIFIC COMMENTS

LADWP appreciates the efforts of Commission staff to further improve the DSGS Program while remaining flexible to the specific needs of the Publicly Owned Utilities (“POUs”). We believe that the majority of the potential modifications to the DSGS Program presented at the January 23, 2024 workshop will generally improve the program overall. We provide these additional comments specific to Option 3.

**1) LADWP suggests allowing distribution utilities to, on a voluntary basis, confirm that Participants are not enrolled in a conflicting utility program.**

With respect to prohibiting dual enrollment, LADWP’s understanding is that the potential modification will require Participants and Aggregators to sign a form attesting or agreeing that there is no dual participation to the best of their knowledge. For additional assurance, the Commission could also allow the distribution utility to, on a voluntary basis, confirm that there is no dual enrollment by checking against utility-specific DER programs. The distribution utility would then inform the Commission if any conflicting participation is discovered. This would require DSGS Aggregators to submit at least monthly lists of added Service Account IDs and/or service addresses to the respective distribution utilities. We believe that this additional step would be prudent to further ensure that the dual participation requirements are met.

**2) Participating V2X resources within POU service territories must follow POU-specific interconnection requirements.**

LADWP supports the potential modification to include V2X within POU service territories. However, Commission staff stated during the workshop that V2X would be eligible if the conditions of California Public Utilities Commission Rule 21 were followed. For V2X DSGS participation in POU service territories, POU-specific interconnection requirements must be followed. Unless V2X resources are required to accommodate POU-specific interconnection requirements, participation of V2X resources should be at the discretion of the POU.

**3) LADWP supports the inclusion of Emergency Energy Alerts as event triggers up to 3pm of the event day.**

LADWP supports the potential modification to include Emergency Energy Alerts as event triggers. Under the current DSGS Program Guidelines, program events for Option 3 are only triggered by a day-ahead signal (i.e. CAISO’s day-ahead market locational marginal price). Allowing program events to be triggered by a same-day signal (i.e. Emergency Energy Alerts) will allow balancing authorities to more fully utilize DSGS resources.

## **CONCLUSION**

LADWP is grateful for the opportunity to participate in the rulemaking process and looks forward to continue working with the Commission to help shape appropriate and effective regulations that will benefit the health, safety, and security of all California residents. If you have any questions, please contact me at (213) 367-4631, or Mr. Rockeish Mckenzie at (213) 367-4341.

Dated: February 5, 2024

Respectfully Submitted,

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