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Docket Number: 22-RENEW-01*

DSGS Proposed Guidelines Fourth Edition

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: October
)	18 th 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 OCTOBER 18, 2024 STAFF WORKSHOP ON
THE DEMAND SIDE GRID SUPPORT PROGRAM**

Bassam Abou-Chakra
Chief Compliance Officer
Los Angeles Department of Water and Power
111 North Hope Street, Room 317
Telephone: (213) 367-4631
Email: Bassam.Abou-Chakra@ladwp.com

Dated: October 30, 2024

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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 October 18, 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 continued custom proposal flexibility offered to POUs remains essential for the reliability and operation of our balancing authority area. We provide these additional comments specific to Option 3 to ensure viability of the DSGS Program in the LADWP balancing authority area.

1) DSGS Aggregators, Providers, and the CEC should not execute test events without first receiving host Balancing Authority (BA) approval.

It is important for host BAs to maintain autonomy in order to maintain grid reliability. LADWP recognizes the importance of supporting statewide efforts and wishes to continue to be part of innovative solutions. However, for a program to be successful, it cannot disrupt balancing authority operations. DSGS Aggregators, Providers, and the CEC should not be initiating and executing DSGS test events independently. Instead, entities outside of the host BA should suggest a time/date for a test event (which the host BA will make their best efforts to accommodate), but ultimately that event should not be executed without the host BA’s approval. This is required for host BAs to accurately plan and operate reliably, especially as aggregation sizes increase over time.

2) LADWP BA must continue maintaining sole control of the dispatch criteria for Option 3, including during energy emergency alerts.

The proposed modification to add energy emergency alert (EEA) triggers to Option 3 should be rejected for POUs acting as the host BA. As with test events, BAs must remain in control of dispatch triggers to ensure reliability of the grid within the BA area. LADWP BA must continue with the custom dispatch proposal without adding EEA triggers. EEAs may sometimes occur under unusual circumstances that are resolved fairly quickly. The host BA should be making the assessment each time there is an emergency alert on whether a DSGS event should be called, taking into account current grid conditions and reliability factors.

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 Ms. Alex Geronilla at (213) 367-8082.

Dated: October 30, 2024

Respectfully Submitted,

Bassam R. Abou-
Chakra

Digitally signed by Bassam R.
Abou-Chakra
Date: 2024.10.30 16:17:48 -07'00'

Bassam Abou-Chakra
Chief Compliance Officer
Los Angeles Department of Water and Power
111 North Hope Street, Room 317
Los Angeles, CA 90012
Telephone: (213) 367-4631
Email: Bassam.Abou-Chakra@ladwp.com



David Hanson
Senior Assistant General Manager, Power System
Los Angeles Department of Water and Power
111 North Hope Street
Los Angeles, CA 90012
Telephone: (213) 367-7199
Email: david.hanson@ladwp.com