

DOCKETED

Docket Number:	22-RENEW-01
Project Title:	Reliability Reserve Incentive Programs
TN #:	261317
Document Title:	Derapi, Inc. Comments - Derapi Inc comments to DSGS 4th ed modified draft guidelines
Description:	N/A
Filer:	System
Organization:	Derapi, Inc.
Submitter Role:	Public
Submission Date:	1/28/2025 7:57:28 AM
Docketed Date:	1/28/2025

*Comment Received From: Derapi, Inc.
Submitted On: 1/28/2025
Docket Number: 22-RENEW-01*

Derapi Inc comments to DSGS 4th ed modified draft guidelines

Additional submitted attachment is included below.



156 2nd Street, Suite 314
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California Energy Commission
715 P Street
Sacramento, CA 95814

January 27, 2025

Re: Docket 22-RENEW-01 Reliability Reserve Incentive Programs, modified proposed draft Demand Side Grid Support (DSGS) Program Guidelines, Fourth Edition

On behalf of Derapi, Inc. I am pleased to submit the following comments regarding the modification to the proposed draft Demand Side Grid Support (DSGS) Program Guidelines, Fourth Edition. I would like to thank everyone at the Commission for their work on the draft, and for accepting many of the suggestions given in our previous comments, as well as those from others. We look forward to participating in the 2025 DSGS program and contributing to its continued success.

About Derapi

Derapi (www.derapi.com) is a California-headquartered startup that provides software data infrastructure services to the Distributed Energy industry, including solar and battery storage installers, demand flexibility providers and energy management firms. Our software application programming interface (API) streamlines communication with behind-the-meter (BTM) distributed energy resources (DER) such as solar inverters, battery storage systems, and other smart energy devices. Our goal is to accelerate electrification and decarbonization by enabling energy consumers to unlock the full value of their investments through the use of data and communication technologies. With respect to the DSGS program, Derapi provides aggregators with certain software capabilities necessary for devices within their aggregation to respond to program events and to retrieve the data necessary to meet reporting requirements of the program.

Comments on the modified proposed draft

We appreciate the Commission making changes to Option 3 in response to our comments. Specifically, we note that:

- minimum aggregation sizes have been reduced,
- the definition of "partners" has been clarified,
- day-of event hours are now excluded from the demonstrated capacity calculation,

- implementation of the prescriptive baseline has been postponed to the 2026 program, and
- more time is being given for aggregators to submit monthly reporting.

We also appreciate the Commission's changes to Option 4, particularly

- removal of the requirement to offer enrollment in market-integrated programs,
- a reduction in the minimum aggregation size
- expansion of the eligible device classes, and
- extension of the time required to submit performance reports.

Again, we thank the Commission for their work on the DSGS program, and for the opportunity to comment on the modified proposed draft guidelines. We thank you for adopting many of our comments, and look forward to their swift approval and implementation. We look forward to participating in the DSGS program in 2025 and helping to deliver the benefits of this program to Californians.

Sincerely,



Thomas Lee
Founder & President
Derapi, Inc.