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Submitted On: 1/28/2025
Docket Number: 22-RENEW-01*

**Modified Demand Side Grid Support Draft Program Guidelines
Fourth Edition**

Additional submitted attachment is included below.

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

In the matter of:

Reliability Reserve Incentive Programs

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Docket No. 22-RENEW-01

LADWP Comments RE:
Modified Demand Side Grid
Support (DSGS) Program
Draft Guidelines,
Fourth Edition

**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER (LADWP) TO THE
CALIFORNIA ENERGY COMMISSION (CEC) NOTICE REQUESTING PUBLIC COMMENTS ON THE
MODIFIED DEMAND SIDE GRID SUPPORT (DSGS) PROGRAM DRAFT GUIDELINES, FOURTH
EDITION**

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Dated: January 28, 2025

**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:
)	Modified Demand Side Grid
)	Support (DSGS) Program
		Draft Guidelines,
		Fourth Edition

INTRODUCTION

The Los Angeles Department of Water and Power ("LADWP") appreciates the opportunity to provide comments to the California Energy Commission ("Commission") regarding the Modified Demand Side Grid Support ("DSGS") Program Draft Guidelines, 4th Edition.

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 provide an opportunity for stakeholders to review and comment on the Modified DSGS Program Draft Guidelines, 4th edition. LADWP provides the following comment specific to Chapter 6, Section E, page 38.

- 1)** Regarding the minimum response time of 20 minutes proposed for program events in Option 4, as some vendor platforms have limitations, 20 minutes may not be achievable. LADWP recommends to change the proposed minimum response time to an hour.

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) 367-0787, or Mr. Andrew Ta at (213) 367-8654.

Dated: January 28, 2025

Respectfully Submitted,

Silvia Lozano

Silvia Lozano (Jan 28, 2025 14:45 PST)

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