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Renew Home Comments on Modified Draft DSGS Guidelines, 4th Edition

Additional submitted attachment is included below.



January 28, 2024

California Energy Commission
Docket No. 22-RENEW-01

Submitted Electronically

RE: Comments on the California Energy Commission's Modified Draft Demand Side Grid Support Guidelines, Fourth Edition

Renew Home values the opportunity to provide comments on the California Energy Commission's (CEC) Modified Draft Demand Side Grid Support (DSGS) Guidelines, Fourth Edition.

Renew Home is an integrated technology provider for utility demand response programs and also provides third-party demand response through its wholly owned subsidiary, OhmConnect, Inc. OhmConnect provides Demand Response (DR) services to residential retail electric customers in California pursuant to Electric Rules 24 (Pacific Gas and Electric Company (PG&E) and Southern California Edison Company (SCE)) and 32 (San Diego Gas & Electric Company (SDG&E)). OhmConnect's cost-free software service notifies households of impending DR events and rewards customers for their automated energy reductions using in-home smart devices. OhmConnect is registered to participate as a DRP in the wholesale electricity market operated by the California Independent System Operator Corporation (CAISO).

OhmConnect has participated in DSGS Options 2 and 3 in prior program years. Our comments focus on the new DSGS Option 4. Renew Home looks forward to helping the CEC maximize the amount of load that can be reduced during times of grid stress to support the reliable provision of electricity to all California residents.

Respectfully submitted,

Elysia Vannoy
Regulatory Affairs Manager

Summary

Renew Home appreciates the modifications that the CEC made to the draft proposed guidelines for Option 4. Specifically, Renew Home strongly supports the removal of the requirement to present an optional step to complete the data sharing agreement required for market integrated DR registration; increasing the incentive level from \$41.40/kW-yr to \$60.58/kW-yr; and detailing the information that should be included in the enrolled participation report for Option 4. These changes significantly improve the program.

However, if the CEC would like to see thousands of smart devices enrolled in Option 4, small changes to the participant enrollment requirements in the final guidelines are necessary. Renew Home reiterates its previous recommendation that aggregators are responsible for ensuring participant eligibility and access to all documentation.¹ The guidelines as written will hinder enrollment in DSGS Option 4 at scale as they require additional action from participants.

Proposed Modification

Clarify that aggregators are responsible for ensuring participant eligibility and access to all documentation.

The goal of Option 4 is to maximize the emergency capabilities of load reduction assets that are not currently operationalized. For aggregators (or companies directly participating [“direct participant”] through an aggregator) that have already received permission from participants to control their devices, participants should not be subject to additional or redundant steps. Presenting additional requirements for participant acknowledgement and agreement will generate unnecessary friction and likely result in significantly reduced participation.

Renew Home recommends that Chapter 6(B) is edited to reflect:

Load flexibility VPP aggregators must collect and maintain the following information to enroll eligible participants under Incentive Option 4...Acknowledgement and agreement from the ~~participant~~ aggregator or direct participant that:

- o The participant meets the eligibility requirements of the DSGS Guidelines and is not enrolled or participating in a conflicting program to the best of their knowledge.
- o The ~~participant~~ aggregator will allow the CEC access to all documentation to verify compliance with the program and program performance.
- o The information submitted is accurate and complete.

¹ 22-RENEW-01 Renew Home Comments filed October 30, 2024.

o The participant ~~agrees to the terms and conditions of the program~~ consents to allow the aggregator or direct participant to facilitate their enrollment in the program.

Conclusion

In conclusion, Renew Home appreciates the CEC's thoughtful modifications to the proposed Option 4 guidelines, which have significantly improved the program. However, to unlock the full potential of residential devices' load flexibility and achieve broad-scale participation, further refinements are essential. Simplifying participant enrollment by designating aggregators as responsible for verifying eligibility and facilitating enrollment will reduce friction and encourage greater participation. Renew Home urges the CEC to adopt this modification to maximize the emergency capabilities of load reduction assets in Option 4.