DOCKETED	
Docket Number:	22-RENEW-01
Project Title:	Reliability Reserve Incentive Programs
TN #:	262208
Document Title:	CPUC Letter to CEC Regarding Agenda Item 7 at March 17, 2025, Business Meeting
Description:	California Public Utilities Commission letter to the California Energy Commission requesting to hold Agenda Item 7 at the March 17, 2025, Business Meeting regarding the Proposed Demand Side Grid Support Program Guidelines, Fourth Edition.
Filer:	Ashley Emery
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	3/17/2025 8:30:15 AM
Docketed Date:	3/17/2025

STATE OF CALIFORNIA GAVIN NEWSOM, Governor

## **PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



March 17, 2025

California Energy Commission Docket Unit, MS-4 715 P Street Sacramento, CA 95814 Re: Docket No. 22-RENEW-01

California Energy Commissioners and Staff,

California Public Utilities Commission (CPUC) Staff respectfully submits the following information of note regarding the Proposed Demand Side Grid Support (DSGS) Program Guidelines, 4th Edition. This proposal is scheduled for the CEC's consideration as Item 7 on the March 17, 2025 Business Meeting Agenda.

On December 14, 2023, the CPUC approved Decision (D.) 23-12-005, which authorized (among other things) Pacific Gas and Electric Company's (PG&E) proposal to implement a market-integrated Automated Response Technology (ART) program. On February 28, 2024, PG&E submitted Advice Letter (AL) 7193-E, requesting authorization to begin implementation of ART. On June 7, 2024, PG&E submitted AL 7193-E-A, updating the ART proposal with supplemental implementation details. AL 7193-E-A was subsequently approved by CPUC Energy Division Staff, effective September 12, 2024.

PG&E's ART program is active, has begun enrolling customers and has capacity commitments under contract. Option 4 in the proposed DSGS Program Guidelines included in Item 7 overlaps substantially with PG&E's ART program, targeting the same market segments and devices, and is likely to undermine the new resource adequacy benefits and other goals of the market-integrated ART program.

I respectfully request that the California Energy Commission hold Item 7 at the March 17 meeting, to provide time to explore the impact of and solutions for any possible duplication of programs, specifically Option 4.

Sincerely,

Leuwam Tesfai

Deputy Executive Director for Energy and Climate Policy California Public Utilities Commission

ewan Jestai

## STATE OF CALIFORNIA

## PUBLIC UTILITIES COMMISSION