

DOCKETED

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Group 4 Comments (Emerging Clean Energy Tech Procurement)

Additional submitted attachment is included below.



From: Rick Brown, PhD, President
To: CEC Docket#: 16-EPIC-01 Project Title: EPIC Idea Exchange
Subject: Request for Comments on Draft Solicitation to Increase Adoption of Emerging Clean Energy Technologies through Procurement
Date: 3/2/17

1. (For all groups) What are barriers that large-scale customers face when procuring emerging energy technology solutions? Would projects funded from this solicitation help address those barriers? If not, what specific changes would you recommend to help ensure the resulting projects meet large-scale customer procurement needs?

Existing strategies for filling the gaps between renewable energy production and consumer demand (i.e., "duck curve") rely on GHG emitting natural gas plants. And while large customer DER procurement strategies are seen as one way to fill this gap; for example, school customers don't always have the incentives or information needed to procure these technologies in a way that where they see such procurements as financially feasible. In addition, existing regulatory and market silos make it difficult to aggregate enough school customers in a locationally beneficial way to take advantage of emerging grid support opportunities.

Using these funds to test methods for public agencies or JPAs (eg, School JPAs) to lead community scale procurements on behalf of themselves and others in their communities would help identify strategies to overcome these barriers.

We would suggest you consider calling out joint DER procurement methods as a preferred option.

2. (For all groups) What are specific recommendations you can provide for improving the purpose of the solicitation outlined in this RFC? Please explain the rationale behind the recommendations.

Call out the potential grid benefits of targeted, community scale DER procurements. (see rationale under #1)

3. (For all groups) Are there existing efforts that complement the groups identified in this RFC? What specific changes to this proposed solicitation would you suggest to best leverage these existing efforts?

The Prop 39 program has done a great job in educating the K-12 school sector on energy issues. I would suggest consulting with CEC Prop 39 staff on any procurement/market/pricing info they may have re Group 4 schools.

4. (For all groups) Are the proposed funding amounts identified in this RFC appropriate for the work requested? Please explain the rationale behind the recommendations, and, if applicable, what would the expected cost be to adequately test and evaluate the technology types identified in this draft solicitation?

Yes. Re Group 4; developing complex analytic tools that cover the diverse set of rate structures across California is not a simple effort; particularly given the relatively primitive and somewhat unreliable Utility data acquisition sources currently available. Grid congestion information is also in its infancy.

8. (For Group 4) What are the largest impediments to successful deployment of solutions that can facilitate successful procurement of emerging energy technologies? Are there solutions not addressed under this proposed solicitation that would address these impediments? Please explain the rationale behind the recommendations.

For many of the organizations listed, energy is not core to their mission or "business model", and so often, even the most competent facilities staff or energy managers have a difficult time getting their organizations to consider implementing "emerging clean energy technologies". There is somewhat of a "herd mentality" within each of these sub-sectors; i.e., once a critical mass of organizations in a particular sector and geography have adopted a technology, it is much easier to get others to do so. But often there isn't a lot of info sharing to accelerate this process. So, we would encourage you to solicit communication and promotion strategies as part of the solution set.