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Decarbonization of electricity requires market-based demand flexibility

Additional submitted attachment is included below.

RECURVE

Comments on
Energy Efficiency and Building Decarbonization
19-IEPR-06
September 24, 2019

Dear California Energy Commission
and California Public Utilities Commission,

Please see Recurve's full presentation and recording at 8/27/2019 workshop for more detailed comments regarding recommended priorities and next steps.

Recurve supports the CEC in identifying market-based solutions enabled by a robust data ecosystem where information drives innovation. We support the energy efficiency principles and the numerous elements supporting the use of hourly data for planning and forecasting outlined in The 2019 California Energy Efficiency Action Plan. We also support the CEC in their acknowledgment of the value of and support of open source tools and solutions to continue to drive innovation and collaboration in the market to address aggressive climate goals.

Recurve also respectfully requests consideration of the recently released article:

> ***"Decarbonization of electricity requires market-based demand flexibility"***
> The Electricity Journal, Volume 32, Issue 7, August–September 2019, 106621
> Matt Golden, Adam Scheer, Carmen Best
> <https://authors.elsevier.com/a/1ZI7S3ic-~-VIB>.
>
> ***Abstract***
> *To effectively decarbonize the electric sector, utilities will need to address the growing load shape challenges driven by the variability of many renewable resources. Behind-the-meter solutions, such as energy efficiency, demand response, electrification and storage, will play an important role in grid stability, but only if they can deliver changes in demand that meet the time and locational needs of the grid. This article will discuss how smart meter interval data, combined with open source methods and software, provide transparent measurement of savings load shapes (resource curves) that enable the integration of demand flexibility into energy, capacity and carbon markets, and as a transmission and distribution resource. This allows utilities to procure demand flexibility in the same way they procure other resources by leveraging a price signal and pay-for-performance to drive innovation and attract private investment.*

This article is directly relevant to the IEPR proceeding and the comprehensive set of issues around decarbonization in California. Ultimately we believe it offers a simplified path forward that aligns with the 2019 California Energy Efficiency Action Plan.

Respectfully submitted,

Carmen Best
Director of Policy & Emerging Markets - RECURVE