

DOCKETED	
Docket Number:	19-OIR-01
Project Title:	Load Management Rulemaking
TN #:	237529
Document Title:	Stefanie Wayland comment on Draft Staff Analysis of Potential Amendments to the Load Management Standards
Description:	N/A
Filer:	System
Organization:	Grounded Analytics/Stefanie Wayland
Submitter Role:	Public
Submission Date:	4/23/2021 1:52:46 PM
Docketed Date:	4/23/2021

*Comment Received From: Stefanie Wayland
Submitted On: 4/23/2021
Docket Number: 19-OIR-01*

Stefanie Wayland comment on Draft Staff Analysis of Potential Amendments to the Load Management Standards

Additional submitted attachment is included below.

April 23, 2021

Comments on the California Energy Commission Docket No. 19-OIR-01: April 12, 2021 CEC Staff Proposed Amendments to the Load Management Standards

Support

I fully support the adoption of the proposed standards.

I am a researcher who has been performing quantitative analysis for energy efficiency and demand response program evaluation for 15 years. I have seen many programs perform well when participants are given the right kind of incentives. I think these standards are proving good incentives. If the load management standards are combined with appliance load flexibility requirements, especially requirements that appliances should be able to receive price signals (over Wi-Fi or radio), ratepayers would be able to rely on their appliances and homes to adjust energy demand according to price and GHG signals.

Timing

Please implement these standards as soon as possible, with only absolutely necessary further study. This report and others make it clear that improving load flexibility is necessary for transportation electrification, grid decarbonization and reliability. These standards must be in place to reduce the likelihood of further grid emergencies like the ones we experienced in summer 2020. Decarbonization especially, must be complete in the next few years to prevent the most serious repercussions of climate change.

Equity

This gives residential and small business electricity customers a chance to participate and share the benefit of shifting and reducing load during peak-periods. To ensure that all customers are able to benefit, please make sure that low-income households, and households without Wi-Fi can access the benefit of these rates by publicly providing the rate signal both over the internet and as e.g. a radio broadcast. While much of the load shift capacity may come from commercial, and industry that are likely internet connected, Agriculture and water pumping may not be internet connected and would benefit from the same signal. This will benefit everyone by including many more customers who are able to shift or reduce load during high price and/or high emissions periods.

MIDAS database and API

It's great! I especially support the inclusion of GHG emissions estimates.

It will be a valuable source of information to researchers like me who have spent hours reading rate descriptions to dig out prices one rate at a time. Some possible improvements are including day-ahead and week-ahead forecasts to the current set of time-series and provide API endpoints to access them.



Please try to ensure that the MIDAS database remains publicly available and is not given to a third-party to maintain. This is valuable information that should be provided openly by a state entity for the greater good.

Cost Effectiveness

It is clear that the current cost-effectiveness analysis is substantially undervaluing the proposed load management standards by providing only a conservative lower-bound. Please consider adding at least middle and high estimates to provide a full picture of the cost effectiveness.

Thank you,

Stefanie Wayland
Folsom, CA