

<b>DOCKETED</b>	
<b>Docket Number:</b>	21-DR-01
<b>Project Title:</b>	Supply Side Demand Response
<b>TN #:</b>	240025
<b>Document Title:</b>	OhmConnect Comments for Working Group Principles Comments - OhmConnect Comments for Working Group Principles
<b>Description:</b>	N/A
<b>Filer:</b>	Courtney Wagner
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	10/8/2021 3:45:03 PM
<b>Docketed Date:</b>	10/8/2021

## Stakeholder Comments Template - Proposed Consolidation of Principles

**Submit comments to:** [Tom.Flynn@energy.ca.gov](mailto:Tom.Flynn@energy.ca.gov)

**Comments are due October 1 by 5:00 p.m.**

All comments received will be posted to CEC Docket 21-DR-01

Instructions: CEC staff is requesting stakeholder comments on the set of nine principles retained, combined, and/or reworded based on stakeholder discussion during the Principles WG meetings held on September 13 and 27. This discussion also resulted in some principles being dropped.<sup>1</sup> Each proposed principle is followed by three questions; please provide a response to each question, as applicable, in the space provided. Toward the end of this comments template, CEC staff is requesting comments, as applicable, in two other areas.

### **Comments on the refined set of principles**

- I. Principles #1, #5, #11 combined – **“The QC methodology, including ex-post performance measurement, should be transparent, replicable, and understandable.”**
  - a. Indicate whether your organization supports the principle as worded, would require changes to support, or opposes the principle. *Response:* [We support this principle but offer several suggested wording changes for the sake of clarity and brevity, below.](#)
  - b. If your organization would require changes to support, what changes would your organization suggest? *Response:* [Suggested revised text: “The QC methodology should be transparent and replicable.”](#) Rationale:
    - 1) The broad reference to “QC methodology” already encompasses ex post measurements; calling it out specifically is unnecessary and

---

<sup>1</sup> Principles #4, #7, #13, #14, #15, #16, #17, #18, #20, #21, #22 were dropped based on stakeholder discussion.

somewhat odd. It is also recognized that ex post data may not be available for completely new programs.

- 2) “Understandable”, while a worthwhile goal, is extremely subjective. It is not entirely clear how compliance with this principle will be ascertained.

- c. Explain your organization’s support or opposition of this principle. *Response:* See response to (b), above.

II. Principles #2, #3 combined – **“The QC methodology should be forward-looking and use the most current information regarding resource capabilities, including historical performance data where possible.”**

- a. Indicate whether your organization supports the principle as worded, would require changes to support, or opposes the principle. *Response:* We require changes to support this principle.
- b. If your organization would require changes to support, what changes would your organization suggest? *Response:* Suggested revised text:

- 1) Principle 1: “The QC methodology should use the most current information regarding resource capabilities, including recent historical performance, where possible.”
- 2) Principle 2: “The QC methodology should be forward-looking, allowing projections for customer growth and customer composition.”

Rationale: These are really two principles because it is possible to meet one part of the original principle but not the other. For example, a QC methodology may use the most recent data, but not be forward looking (e.g., E3’s ELCC refresh). Equally, a QC methodology may be forward looking, but not necessarily use the most recent data (e.g., LIPs as currently performed). Each is important and deserves attention.

- c. Explain your organization’s support or opposition of this principle. *Response:* See response to (b), above.

III. Principle #6 – **“The QC methodology should be sufficiently fast and easy to update to enable DR providers to participate in all capacity solicitations.”**

- a. Indicate whether your organization supports the principle as worded, would require changes to support, or opposes the principle. *Response:* We support this principle.

- b. If your organization would require changes to support, what changes would your organization suggest? *Response:*
  - c. Explain your organization's support or opposition of this principle. *Response:*
- IV. Principle #8 – **"The QC methodology should be compatible with individual DR resources and aggregations of resources."**
  - a. Indicate whether your organization supports the principle as worded, would require changes to support, or opposes the principle. *Response:* We cannot support this principle because we do not fully understand what it intends to convey.
  - b. If your organization would require changes to support, what changes would your organization suggest? *Response:*
  - c. Explain your organization's support or opposition of this principle. *Response:*
- V. Principle #9 – **"The QC methodology should be consistent and compatible with the RA program."**
  - a. Indicate whether your organization supports the principle as worded, would require changes to support, or opposes the principle. *Response:* This seems fundamental. We support this principle.
  - b. If your organization would require changes to support, what changes would your organization suggest? *Response:*
  - c. Explain your organization's support or opposition of this principle. *Response:*
- VI. Principle #10 – **"The QC methodology should account for all factors that substantially influence DR variability."**
  - a. Indicate whether your organization supports the principle as worded, would require changes to support, or opposes the principle. *Response:* We support the adoption of either this principle or principle #7, below, but not both. They are very similar and keeping both is confusing. We recommend keeping principle #7 only as it is more comprehensive.
  - b. If your organization would require changes to support, what changes would your organization suggest? *Response:*
  - c. Explain your organization's support or opposition of this principle. *Response:*
- VII. Principle #12 – **"The QC methodology should account for the use-limited, availability-limited, and variable-output nature of DR."**

- a. Indicate whether your organization supports the principle as worded, would require changes to support, or opposes the principle. *Response:* We support the adoption of either this principle or principle #6, above, but not both. They are very similar and keeping both is confusing. We recommend keeping this principle only as it is more comprehensive.
- b. If your organization would require changes to support, what changes would your organization suggest? *Response:*
- c. Explain your organization's support or opposition of this principle. *Response:*

VIII. Principle #19 – **“The QC methodology should accurately account for DR’s contribution to reliability.”**

- a. Indicate whether your organization supports the principle as worded, would require changes to support, or opposes the principle. *Response:* We oppose the adoption of this principle.
- b. If your organization would require changes to support, what changes would your organization suggest? *Response:*
- c. Explain your organization's support or opposition of this principle. *Response:* This principle prejudices the results of the DR QC Working Group. Currently, the only methodology that directly complies with this principle is the ELCC. Therefore, this principle is simply another way to state “the QC methodology should be the ELCC.” We can and should discuss the merits of this methodology, but the principles should not prejudice a specific outcome.

IX. Principle #23 – **“The QC methodology should, to the extent possible, rely on software or code that is available at nominal cost to DR providers.”**

- a. Indicate whether your organization supports the principle as worded, would require changes to support, or opposes the principle. *Response:* We support this principle with changes.
- b. If your organization would require changes to support, what changes would your organization suggest? *Response:* Suggested revised text: “The QC methodology should not be unduly financially burdensome to DR providers.”

*Rationale:* The Principle is unnecessarily specific. The cost of the QC exercise can and does go beyond the cost of a particular code or software. One can argue that the LIP exercise is expensive not because the software or code itself is expensive, but that the process and reporting requirements are so extensive that they unnecessarily inflate costs.

To that end, while “unduly burdensome” is subjective, there is likely some consensus that can be reached regarding reasonable costs.

- c. Explain your organization’s support or opposition of this principle. *Response:*  
See response to (b), above.

**Comments about principles not included**

Please provide any comments concerning principles that your organization believes are missing from the refined set of principles.

*Response:*

**Any additional comments**

Please provide any additional comments that your organization would like to make.

*Response:*