

DOCKETED

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Stakeholder Comments Template - Proposed Consolidation of Principles

Submit comments to: 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.¹ 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: **Support**
 - b. If your organization would require changes to support, what changes would your organization suggest? Response: **N/A**
 - c. Explain your organization’s support or opposition of this principle. Response: ***Clarity and transparency are admirable goals, subject to applicable confidentiality requirements.***

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

- 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: **Support***
 - b. If your organization would require changes to support, what changes would your organization suggest? *Response: **N/A***
 - c. Explain your organization’s support or opposition of this principle. *Response: **SCE supports this principle. Past actual performance is the best indicator of future performance for existing resources/programs. However, it is critical to account for enrollment forecasts and any changes to program design that impact performance expectations going forward.***
- 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: **Support with changes***
 - b. If your organization would require changes to support, what changes would your organization suggest? *Response: **Replace ‘fast and easy’ with ‘straightforward’ and more clearly define what needs to be “fast” or “straightforward”. Also, change “participate in all capacity solicitations” to “facilitate transactions”.***
 - c. Explain your organization’s support or opposition of this principle. *Response: **We are unclear on why the “methodology” needs to be fast. Do you mean that the process of determining a resource’s QC (with this new methodology) should be a quick process?***
- 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: **Support***
 - b. If your organization would require changes to support, what changes would your organization suggest? *Response: **N/A***
 - c. Explain your organization’s support or opposition of this principle. *Response: **Agree that the QC methodology should be flexible enough to be used for DR at any quantity of MW or customers.***

- 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: **Support***
 - b. If your organization would require changes to support, what changes would your organization suggest? *Response: **N/A***
 - c. Explain your organization’s support or opposition of this principle. *Response: **Agree that consistency and compatibility with the RA program are essential to this process.***
- 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: **Support with changes, see response to principle #12.***
 - b. If your organization would require changes to support, what changes would your organization suggest? *Response: **Include, “It would consider different loss of load expectation (LOLE) between day types (i.e., weekdays versus weekends).”***
 - c. Explain your organization’s support or opposition of this principle. *Response: **It makes sense to take into account variations in weather, season or customer type when determining QC.***
- 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: **Support with changes***
 - b. If your organization would require changes to support, what changes would your organization suggest? *Response: **Recommend potentially combining this with principle #10: “The QC methodology should account for all factors that substantially influence DR variability including use-limitations, availability limitations and the variable nature of DR.”***
 - c. Explain your organization’s support or opposition of this principle. *Response: **Combining with principle #10 would be more efficient.***
- 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: **Support***
 - b. If your organization would require changes to support, what changes would your organization suggest? *Response: **N/A***
 - c. Explain your organization's support or opposition of this principle. *Response: **Accuracy is good and this should result in DR being more appropriately valued.***
- 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: **Oppose***
 - b. If your organization would require changes to support, what changes would your organization suggest? *Response: **N/A***
 - c. Explain your organization's support or opposition of this principle. *Response: **Simplicity is already captured in Principle III.***

Comments about principles not included

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

*Response: **N/A***

Any additional comments

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

*Response: **N/A***