

DOCKETED	
Docket Number:	21-DR-01
Project Title:	Supply Side Demand Response
TN #:	241491
Document Title:	San Diego Gas & Electric Company Comments - on SSDR Working Group Draft Report
Description:	N/A
Filer:	System
Organization:	San Diego Gas & Electric Company
Submitter Role:	Public
Submission Date:	2/8/2022 4:47:43 PM
Docketed Date:	2/8/2022

*Comment Received From: San Diego Gas & Electric Company
Submitted On: 2/8/2022
Docket Number: 21-DR-01*

SDG&E Comments on SSDR Working Group Draft Report

Additional submitted attachment is included below.



Sarah M. Taheri
Regulatory Affairs Manager

915 L Street, Ste. 650
Sacramento, CA 95815

cell: 916.708.7409
email: staheri@sdge.com

February 8, 2022

California Energy Commission
Docket Office
Docket No. 21-DR-01
715 P Street
Sacramento, CA 95814

SUBJECT: SDG&E Comments on Qualifying Capacity of Supply-Side Demand Response Working Group Draft Report (Docket No. 21-DR-01)

San Diego Gas & Electric Company ("SDG&E") appreciates the opportunity to provide comments on the CEC's Draft Report on Qualifying Supply-Side Demand Response ("Draft Report"). SDG&E participated in Commission Staff's Working Group and is engaged in conversations on this issue across the agencies, including in discussions at the CAISO and the CPUC. We respectfully offer the below, general comments on the Draft Report and have also attached detailed comments on specific areas of the draft.

- I. The Draft Report should reflect the diversity of stakeholder views to help identify areas that may require further stakeholder discussion.**
 - a. The Draft Report should clearly identify where stakeholders agreed on certain issues, as well as where there were disagreements.** In several parts of the Draft Report, it is noted that stakeholders expressed a certain view; however, clarification is needed on which parties agreed with a given perspective and which disagreed. To help identify areas which may require further stakeholder discussion, SDG&E recommends the Draft Report be amended to include this level of detail throughout. In addition, to the extent individual stakeholder views are presented in the report, it should be clearly delineated as such to ensure that opinions cannot be misconstrued as fact.

- b. All stakeholder proposed methodologies for determining qualifying capacity should be incorporated in the report.** As further detailed in our attached comments, it appears that some of the proposals put forth by stakeholders for determining qualifying capacity are not referenced or detailed in the Draft Report. We understand that some of these options are not interim options but believe that their inclusion—at least by reference—would be beneficial as discussions on this issue continue.
- II. Stakeholders need access to data inputs and assumptions to effectively evaluate the feasibility of proposed methodologies.** Without the ability to test the proposed methodologies and models with utility-specific data, we cannot adequately determine whether the proposed models will work for our utility.
- III. Where possible, terminology in the Draft Report should align with that used in relevant CAISO and CPUC proceedings.** The Draft Report may benefit from additional context which helps the reader understand how certain terms are used, especially if terminology differs from that used in technical proceedings at the CAISO and CPUC. In the attachment, we have identified a few areas where such clarifications would be helpful.
- IV. The Final Report should include the principles established in the SSDR Working Group.** Early in the Working Group process, stakeholders established a set of principles for the working group process and collaborative development of the report. SDG&E suggests that these principles should be included in the final report as an appendix.

Thank you for your consideration of these comments. We welcome the opportunity to discuss the issues we have raised in greater detail. We look forward to continuing to work with Commission staff as the report is finalized.

Sincerely,

/s/

Sarah M. Taheri
Regulatory Affairs Manager

Attachment: SDG&E's Detailed Comments on CEC Draft SSDR Report