DOCKETED		
Docket Number:	22-RENEW-01	
Project Title:	Demand Side Grid Support Program	
TN #:	244021	
Document Title:	Steve Uhler Comments - RENEW-22-01 Does MIDAS support UNIDE	
Description:	N/A	
Filer:	System	
Organization:	Steve Uhler	
Submitter Role:	Public	
Submission Date:	7/11/2022 10:16:37 PM	
Docketed Date:	7/12/2022	

Comment Received From: Steve Uhler

Submitted On: 7/11/2022

Docket Number: 22-RENEW-01

#### **RENEW-22-01 Does MIDAS support UNIDE**

RENEW-22-01 Does MIDAS support UNIDE?

There is more work to be done before the Energy Commission Commissioners consider adopting the proposed regulations in docket 21-OIR-03.

Perhaps MIDAS doesn't support CPUC UNIDE hourly tiered energy subscription rate plan proposal?

See attached presentation and search for "Proposed Roadmap: Step 5" or use the below links.

https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/demand-response/demand-response-workshops/advanced-der---demand-flexibility-management/slides-unide-workshop\_gupta.pdf#page=50

These youtube video links provide Achintya Madduri's, California Public Utilities Commission description of CPUC UNIDE hourly tiered energy subscription rate plan proposal.

https://youtu.be/CrTngYVXUbI?t=2090

https://youtu.be/CrTngYVXUbI?t=2177

https://youtu.be/CrTngYVXUbI?t=2900

Other attendee comments on need to be equitable.

https://youtu.be/CrTngYVXUbI?t=3570

The use of hourly tiered energy rates will be equitable and more likely to comply with California's consumer protections in statute.

Steve Uhler sau@wwmpd.com

Additional submitted attachment is included below.



# Forward Looking Vision: Advanced DERs & Demand Flexibility Management

Aloke Gupta
DR Section, Energy Division
May 25, 2021





## Agenda

- System Needs
- Opportunity
- Current Approach
- Forward Looking Vision
- Proposed Roadmap
- Discussion





#### **Executive Summary**

#### **Policy Objective**

#### Improve demand-side resource management...

- Through more effective demand response (DR) and retail rate structures,
- That leverage opportunities enabled by long term electrification and DER deployment,
- To better address grid issues associated with the growth of renewables, electrification, and DER adoption, and support California's clean energy goals.

#### **Staff Proposal**

Jointly pursue reforms of DR programs and Rate structures to Promote *Unified Strategies* for Demand (Load) Management and Grid Optimization to achieve widespread demand flexibility.



## **Anticipated Issues over the Next Decade**

#### Increasing renewables penetration

- Increased curtailment
- Steeper ramps → reliability challenge
- Increased reliance on intermittent, use-limited supply → reliability challenge

#### Increasing electrification of end uses (buildings, transportation)

Increased cost of service due to higher load, if unmanaged

#### Increasing DER deployment

- Grid instability and increased cost of service, if unmanaged
- Fair compensation and cross-subsidy challenges

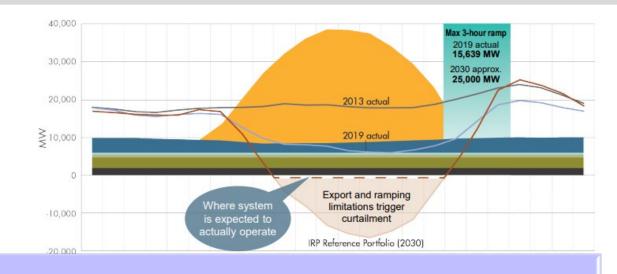




#### **2019 IRP\* Reference System Plan Implications**

#### System trends by 2030:

- 60% increase in evening ramp
- Substantial increase (15x) in renewables curtailment



#### **IRP** analysis:

- DR can be a cost-effective alternative for renewables integration resources
- But highly scalable, low-cost deployment strategies are needed to realize that potential



## **Agenda**

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#### Opportunity: Proliferation of DERs & Electrification Demand Flexibility

Doubling of rooftop solar

3.5x growth in BTM storage
 5.5 GWh storage capacity

Transportation electrification 5M EVs ~ 250 GWh aggregate storage capacity

Substantial growth of smart, flexible end uses

**20 GW** 

~ 4.5x utility storage

Building decarb

Smart devices & plugs

- Smart thermostats/heat pumps,
- Smart electric (heat pump) water heaters
- Growth of microgrids and other flexible emerging end uses

**Opportunity or Threat** 





## Agenda

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## **Current Approaches to Achieving DR (Demand Flexibility)**

#### Time-Differentiated Rates (Load Modifying DR)

- Increasing number of special purpose IOU rates: TOU, CPP, EV, SGIP GHG signal ...
- Increasing number of CCAs & Rates!
- Lengthy ratemaking process, generally lagging (out of date), sometimes conflicting
- Administratively complex & confusing to customers, industry

#### Market-Integrated, Incentive-based DR Programs (Supply Side DR)

- Multiple programs focused on load shed as resource adequacy
- Challenges in CAISO market integration, measurement & verification
- Considering new programs for load shift DR
- Administratively & <u>technically complex</u>, <u>inefficient</u>, <u>high transaction costs</u>

#### <u>Current Procurement Options</u>

- IOU DR programs
- IOU LCR DR contracts
- DRAM
- CCA DR contracts





## Issues with Market Integrated Pathway (Per Joint Solar/Storage Parties in Resource Adequacy Rulemaking\*)

All BTM DERs providing capacity should have the option to forgo market integration, as the market-informed pathway is simpler and avoids obstacles impeding DER providers, such as the following:

- 1. Issues surrounding interconnection of exporting resources are eliminated as Rule 21 clearly governs.
- 2. Complexity and cost associated with market integration and dispatch are also eliminated.
- 3. Issues associated with visibility at the T&D interface, necessitating communication and visibility of resource performance by both the distribution operator and the CAISO, are eliminated.
- 4. Concerns associated with double payment for electricity from NEM systems wholesale market revenue for settled resource export vs. retail bill credits for NEM are eliminated.
- 5. Aggregators are better able to dispatch resources to meet specific local needs, rather than rely entirely on system-level CAISO dispatch, which may be inconsistent with local needs.
- 6. Thorny issue of deliverability to the transmission system is avoided entirely.
- 7. The only CAISO tariff for Rule 21 connects DERs is PDR, which does not credit energy exported to the grid.

\*Joint Solar/Storage Parties Track 4 Proposal, January 28, 2021, at 4. RA Proceeding R.19.11.009 (SUNRUN, CESA, CALSSA, TESLA, CEERT, VOTE SOLAR, AND ENELX)





## **Current Approaches to Achieving Demand Flexibility**

- Time-Differentiated Rates (Load Modifying Demand Response [DR])
  - Increasing number of special purpose IOU rates: TOU, CPP, EV, SGIP GHG signal ...
  - Increasing number of CCAs & Rates!
  - Lengthy ratemaking process, generally lagging (out of date), sometimes conflicting
  - Administratively complex & confusing to customers/indus
- → Complex, inefficient, expensive, confusing
- → Limited adoption, Difficult to scale
- → High cost of controls, automation
- Market-Integrated, Incentive-based DR Programs (
  - Multiple programs focused on load shed as resource adeq
  - Challenges in CAISO market integration, measurement & verification
  - Considering new programs for load shift DR
  - Administratively & <u>technically complex</u>, <u>inefficient</u>, <u>high transaction costs</u>
- IOU DR programs
- IOU LCR DR contracts
- DRAM
- CCA DR contracts

#### Distribution level DR

- Additional localized, temporary rate/incentive tariffs or
- Incremental DER procurement contracts



#### **Path Forward: Consolidation**

#### **Present**

**Basket of Rates** 

(cost recovery / allocation, equity)

## Basket of Supply-Side Programs (market integrated)

+ TBD: Load Shift Programs

#### **Distribution Level DR**

- → Complex, inefficient, expensive, confusing
- → Difficult to scale, Limited adoption
- → High cost of controls, automation

#### **Future**

Demand Side: Unified, universal, dynamic, economic (UNIDE) signal

- → Reduced complexity, Single point focus
- → Highly scalable, widespread adoption
- → Reduced cost of controls, automation





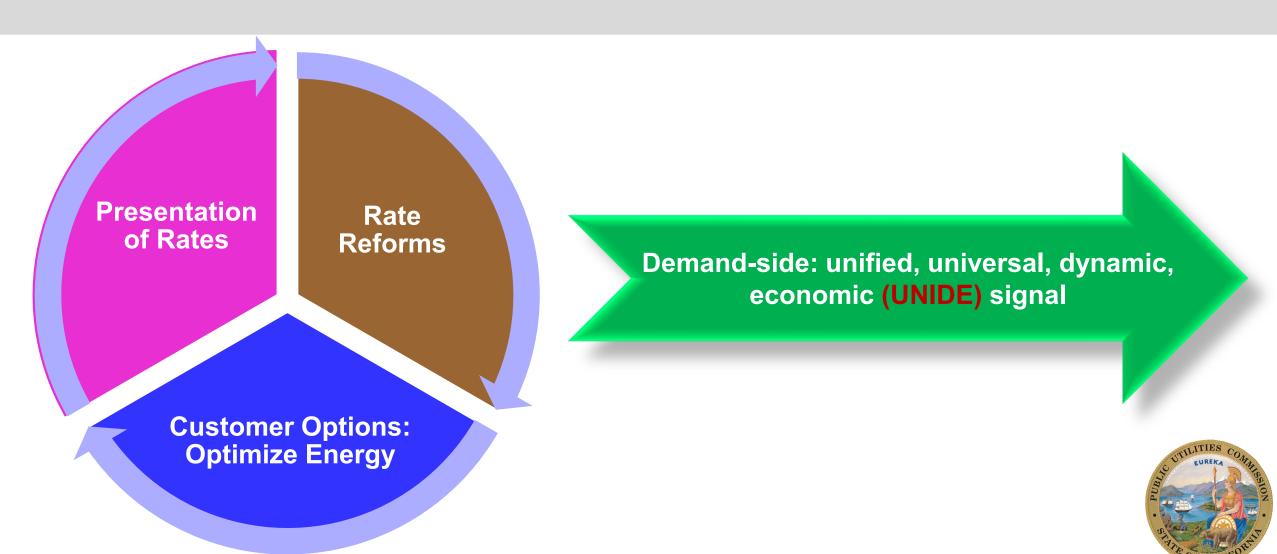
## Agenda

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#### Three Part Vision UNIDE





#### **Goal: Achieve Widespread Demand Flexibility**

Leverage significant opportunity resulting from electrification, DER adoption

#### **Challenges**

#### Increasing renewables penetration

- Increased curtailment
- Steeper ramps → reliability challenge
- Increased reliance on intermittent, use-limited supply → reliability challenge

## Increasing electrification of end uses (buildings, transportation)

• Increased cost of service due to higher load, if unmanaged

#### Increasing DER deployment

- · Grid instability and increased cost of service, if unmanaged
- Fair compensation and cross-subsidy challenges

#### **Opportunities**

- → Enhance renewables integration & reduce emissions
- Reduce curtailment
- → Enhance reliability
- Reduce system ramp
- Intermittent supply balanced by dispatchable demand
- Managed coordination of DER operations
- → Minimize cost of service
- Managed load growth and DER operations
- → Provide fair compensation of DER services stack





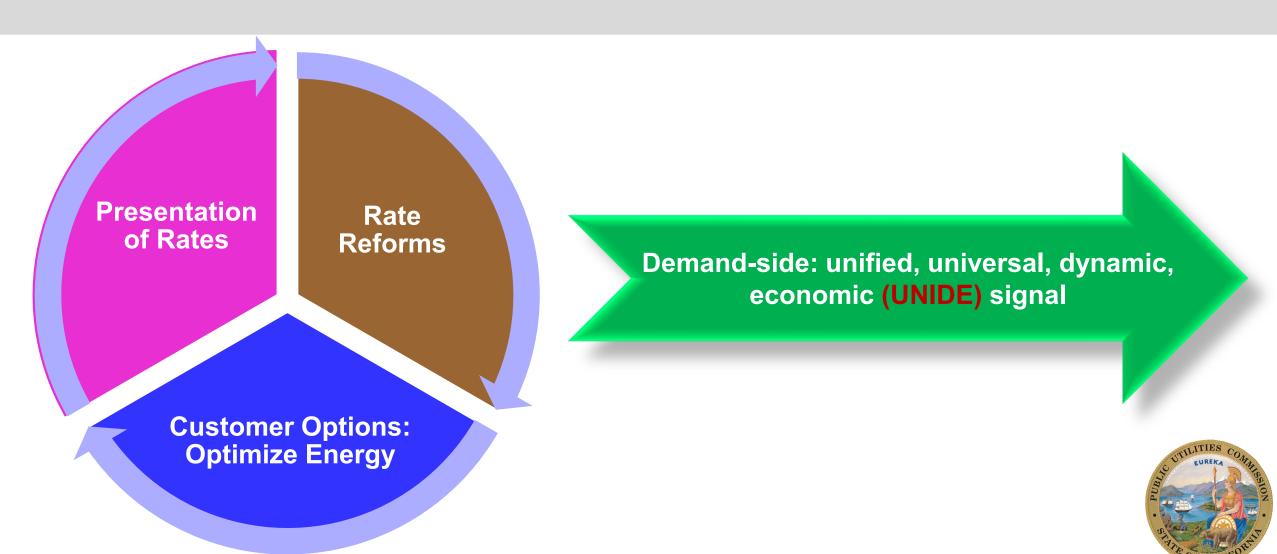
## Agenda

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#### Three Part Vision UNIDE





## **Proposed Roadmap**

Step 1:	
Step 2:	
Step 3:	
Step 4:	
Step 5	
Step 6	

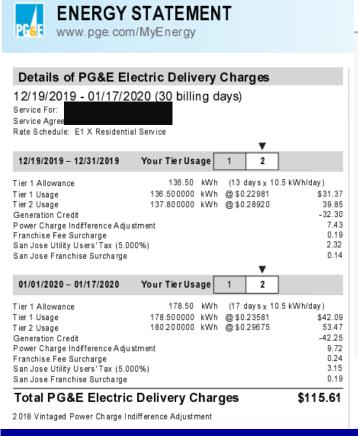
Demand Side: unified, universal, dynamic, economic (UNIDE) signal



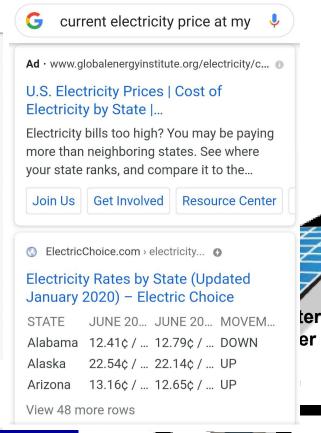




## **Electricity Price Presentation to Customers (Today)**







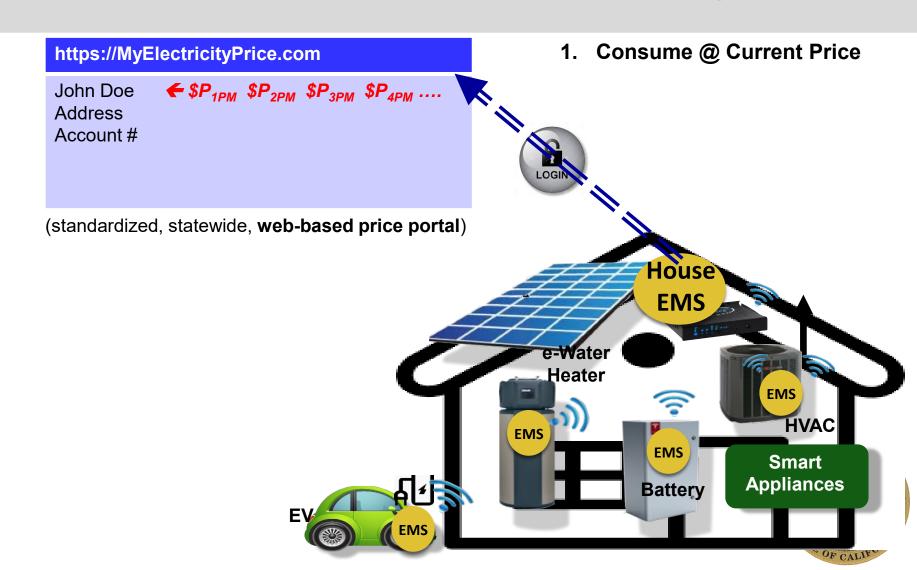
current weather at my locatio **IMAGES** Murillo, San Jose, CA **TOMORROW** 10 DAYS TODAY **CURRENTLY** Mostly Cloudy Feels like 57° Today, February 23 Partly Cloudy **Appliances** 

**Battery** 

- Practically non-existent information on "current" electricity price
- Price discovery ~ difficult process
- "Manual" EMS configuration in field → expensive

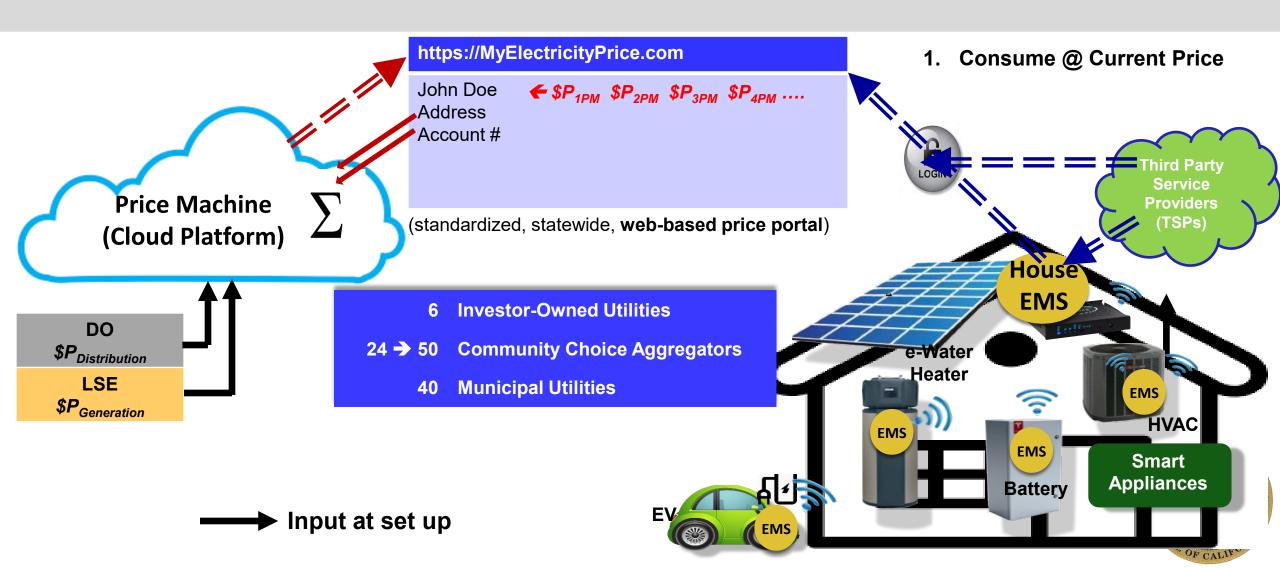


## **Step 1: Standardized, Universal Access to Electricity Price**





## **Step 1: Standardized, Universal Access to Electricity Price**





#### **Auto-Configuration of Smart Devices**

- Buy and install smart device
- Embedded EMS automatically connects (via internet) to...

https://www.MyElectricityPrice.com

- Access real-time price time series (hourly, sub-hourly)
- Day-ahead forecast, hour-ahead forecast
- Remote upgrade of EMS as needed for changes, new features





**→** Enable Scalability, Wide-scale Adoption



#### Step 1: Standardized, Universal Access to Current Electricity Prices

- 1. Provides current, localized, composite electricity price specific to a service territory and customer
- 2. Accommodates pricing inputs from regulatory entities (DO, LSE)
- 3. Leverages large "ecosystem" to educate and help customers manage energy and DERs
- 4. Facilitates widespread adoption ← → cost reduction of demand (load) management automation





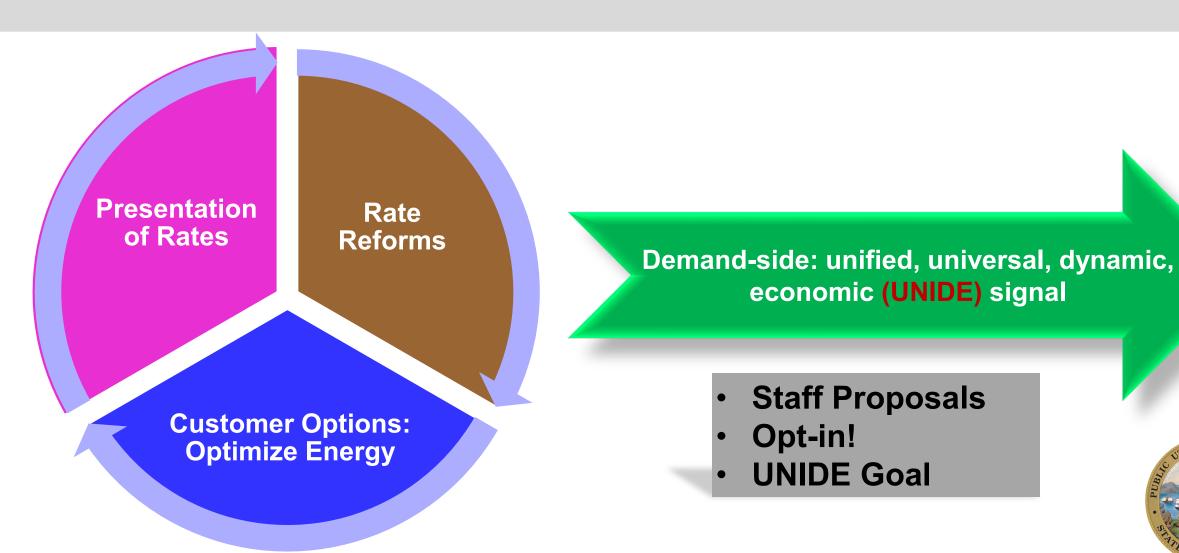
## **Proposed Roadmap: Step 1**

Step 1: Develop standardized, universal access to current electricity price				

Demand Side: unified, universal, dynamic, economic (UNIDE) signal



#### Three Part Vision UNIDE





## **Proposed Roadmap: Step 2**

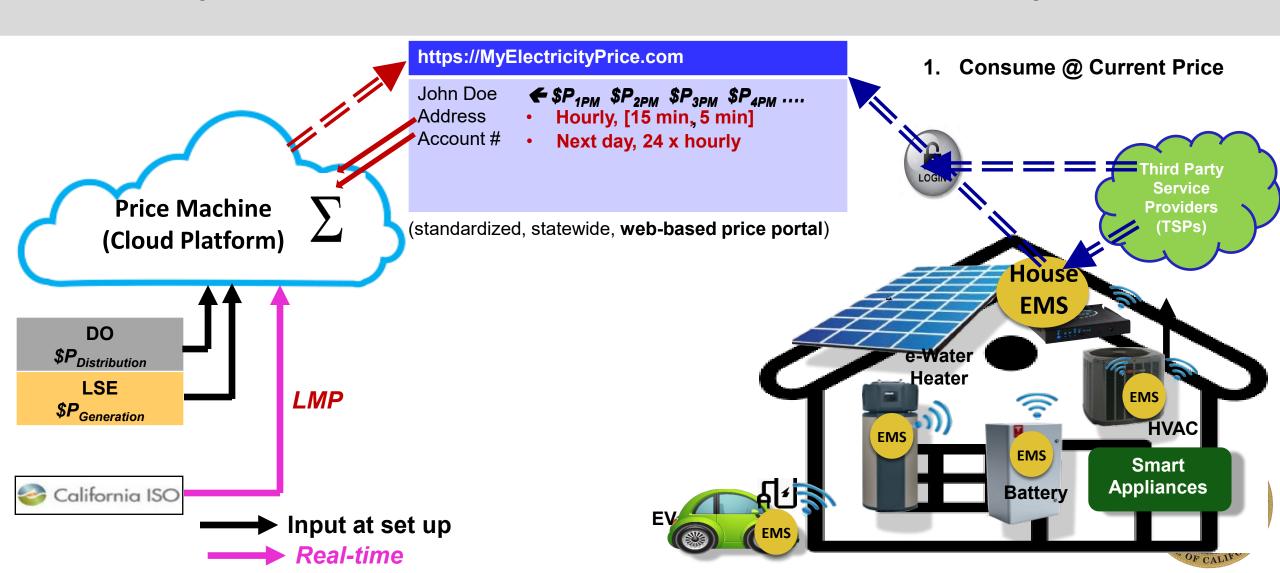
Step 1: Develop standardized, universal access to current electricity price				
Step 2: Introduce dynamic prices based on real-time, wholesale energy cost (opt-in)				

Demand Side: unified, universal, dynamic, economic (UNIDE) signal



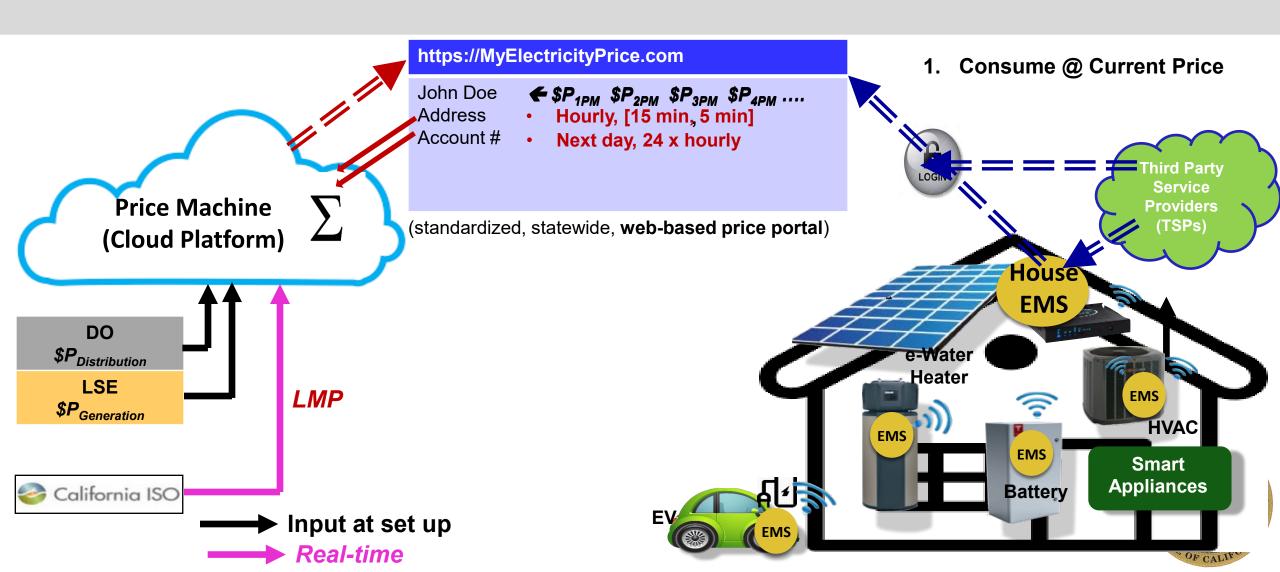


#### **Step 1: Standardized, Universal Access to Electricity Price**





#### **Step 2: Introduce Dynamic Price per CAISO Wholesale Energy Cost**





## **CAISO Energy Day-Ahead Market (DAM): Price Statistics\***

	Units	2018	2020
Weighted average DAM price (WADP)	¢/kWh	4.4	3.9
% annual hours below WADP		71.8%	76.4%
% annual hours below 2 x WADP		96.4%	97.5%
# annual hours above 2 x WADP	Hours	315	222
Lowest DAM Price	¢/kWh	-1.6	-1.0
# hours below \$0	Hours	75	41
Highest DAM Price	¢/kWh	93.5	101.9
Highest DAM price to WADP ratio		21.2x	26.2x
Price Range in Top 10% of Net Load	¢/kW.	11.8 – 93.5	8.8 – 101.9
# hours responsible for Top 10% of net load	Hours	30	29

<sup>\*</sup>Preliminary estimates – not peer reviewed



#### **Step 2: Real-Time Locational Price Linked to CAISO Markets**

- 1. Reflects CAISO market conditions, encourages load shift or increase
- 2. Helps reduce curtailment, evening ramp, emissions
- 3. Helps enhance reliability
- 4. Helps reduce energy procurement costs (reduces hedging cost)
- 5. Complements anticipated updates to CEC's Title 20 (Load Management Standards)



## **Electricity Price Dissected - Energy**

Generation	Fixed - generation capacity	Variable - energy			
Distribution	Fixed - distribution grid capacity				
Misc	Metering, Billing, Legal, G&A				
Transmission	Fixed - transmission grid capacity				





## **Electricity Price Dissected - Capacity**







## **Proposed Roadmap: Step 3**

Step 1: Develop standardized, universal access to current electricity price

Step 2: Introduce dynamic prices based on real-time, wholesale energy cost (opt-in)

Step 3: Modify prices per real-time, localized grid conditions (opt-in)

Demand Side: unified, universal, dynamic, economic (UNIDE) signal





## **Electricity Price Dissected - Capacity**



#### 1. Composite and component prices must be time-dependent, volumetric: \$/kWh

- Not based on capacity: \$/kW (such as, monthly demand charges)
- Not based on historical consumption (such as, stepped tiers)

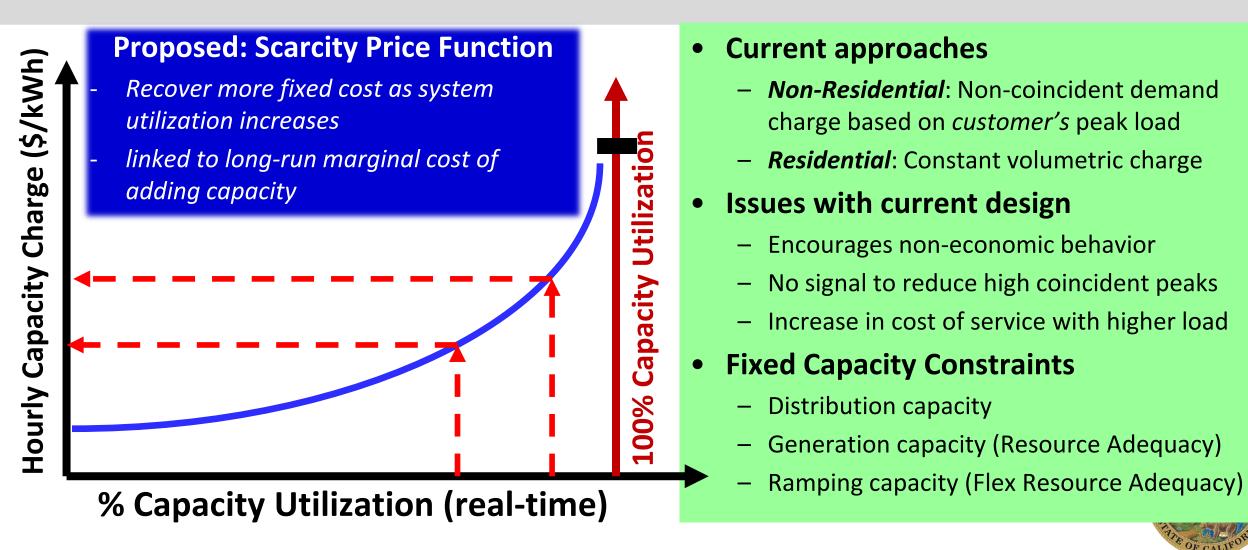
#### 2. Recover more fixed cost when system utilization is higher

aka "scarcity price function"

F CALL

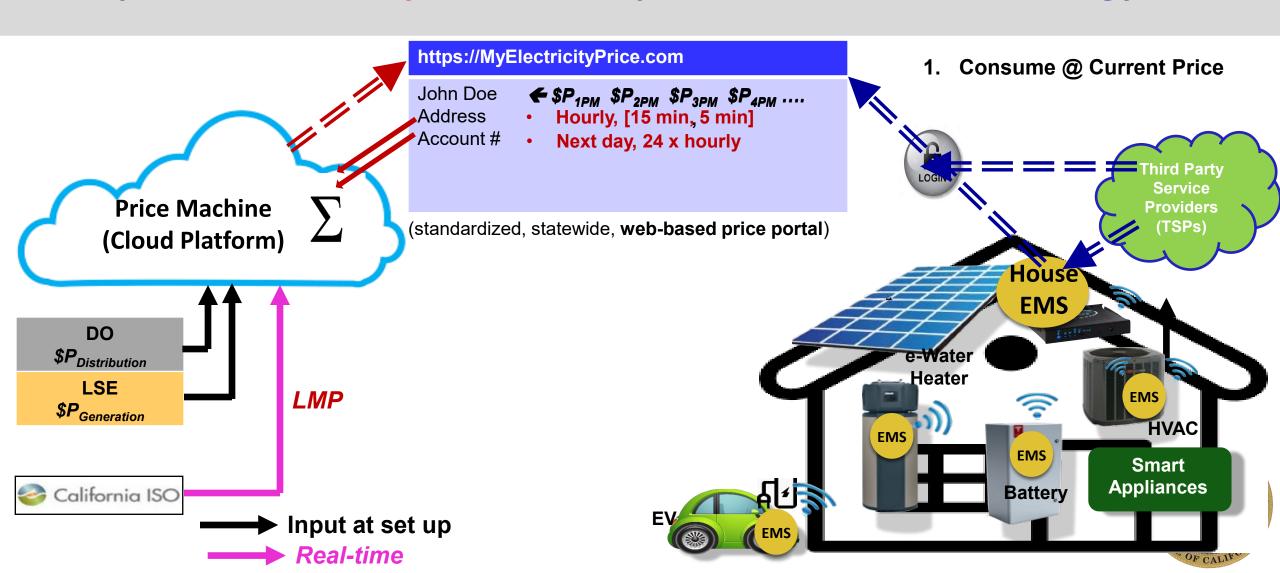


## **Step 3: Fixed Cost Recovery - Options**



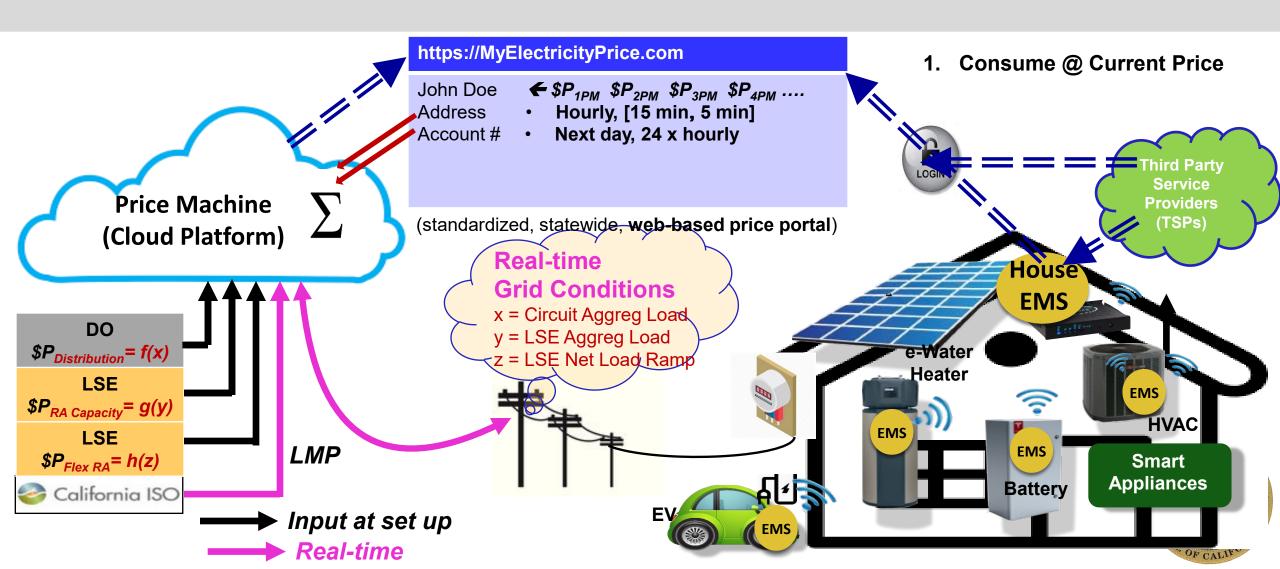


#### **Step 2: Introduce Dynamic Price per CAISO Wholesale Energy Cost**





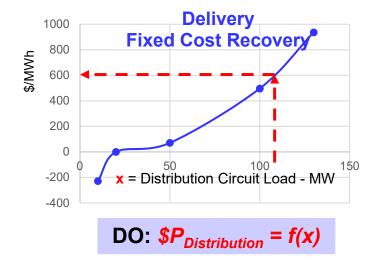
## **Step 3: Modulate Electricity Price Per Local Grid Conditions**

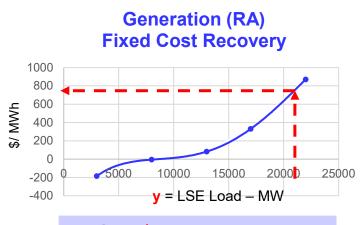




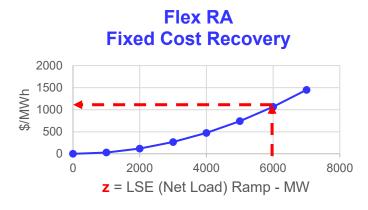
#### **Developing a Composite Economic Signal based on Grid Utilization\***

- Scarcity pricing functions & grid conditions determine Delivery, Generation and Flex prices:
  - Based on long-run marginal cost of adding new capacity
  - Designed to recover the required annual revenue in the target year









LSE:  $P_{Flex RA} = h(z)$ 

CAISO: Real-time Locational Marginal Price (\$LMP)

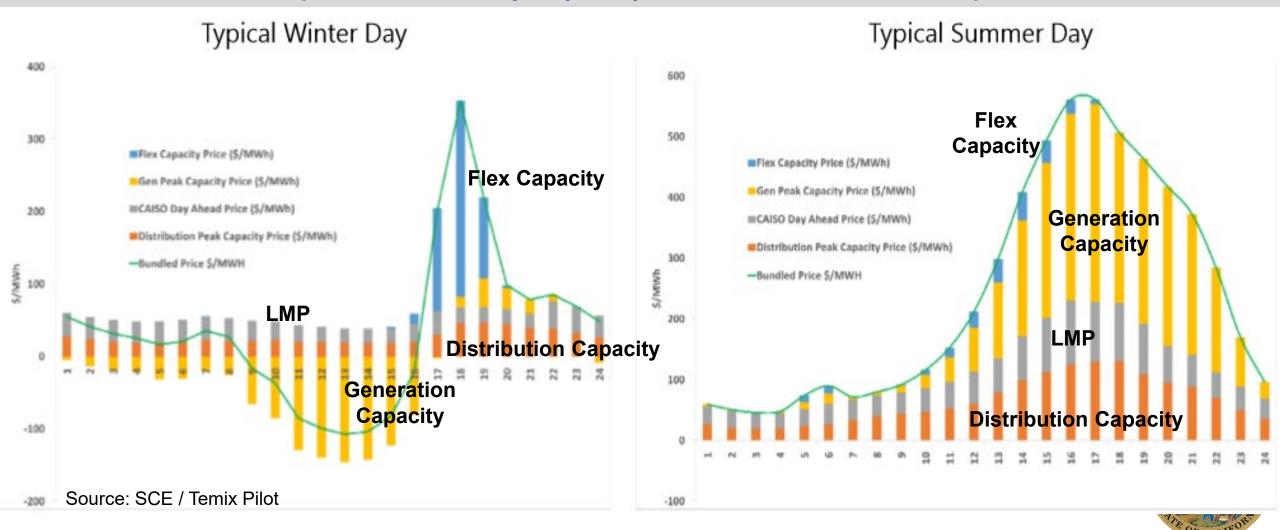
- Price Machine computes composite spot price = \$P<sub>Distribution</sub> + \$P<sub>RA Capacity</sub> + \$P<sub>Flex RA</sub> + \$LMP
- Other fixed costs (metering, billing, etc.) included in "base" price





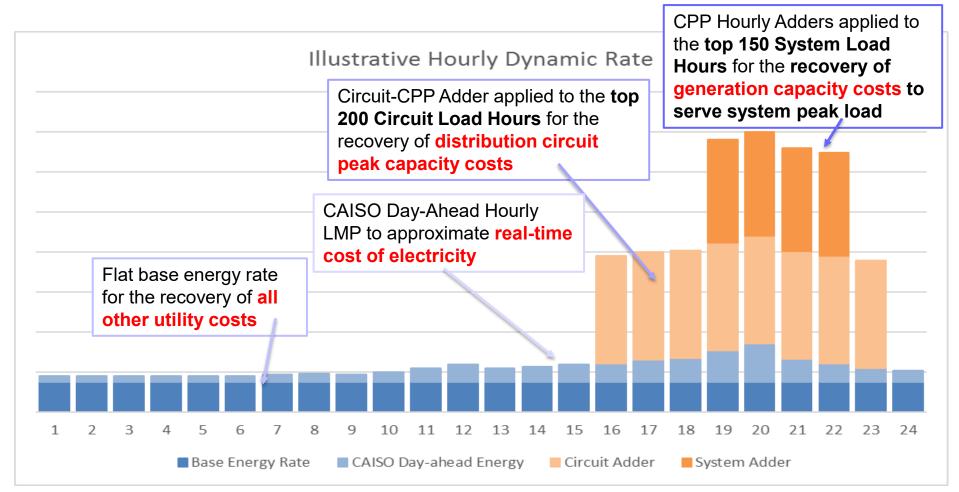
## **EPIC Pilot: Composite Hourly Prices**

(based on Hourly Capacity Utilization & CAISO LMP)





## Alternate Example: SDG&E "Power Your Drive" Rate



System-level CPP - an energy rate option that provides a "capacity" price signal

Circuit-level CPP
provides a locational
price signal while
preserving customer
equity by still charging all
customers the same price



#### **Step 3: Rate Reform Objectives via Hourly Capacity Charge**

- 1. Encourage load shift / increase complementary to grid-based economics avoid uneconomical arbitrage
- 2. Shift fixed cost recovery burden onto load driving high system utilization and capacity upgrades
- 3. Ensure full recovery of revenue requirements
- 4. Minimize long-term infrastructure upgrades & investment with electrification and related cost of service
- 5. Allow flexible rate design options to reflect policy choices and accommodate:
  - Different decisions by different regulatory entities
  - Different cost allocations and recovery by customer class
  - More frequent and granular updates to maintain revenue collection on target





## Issues with Market Integrated Pathway (Per Joint Solar/Storage Parties in Resource Adequacy Rulemaking\*)

All BTM DERs providing capacity should have the option to forgo market integration, as the market-informed pathway is simpler and avoids obstacles impeding DER providers, such as the following:

- 1. Issues surrounding interconnection of exporting resources are eliminated as Rule 21 clearly governs.
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\*Joint Solar/Storage Parties Track 4 Proposal, January 28, 2021, at 4. RA Proceeding R.19.11.009 (SUNRUN, CESA, CALSSA, TESLA, CEERT, VOTE SOLAR, AND ENELX)





## **Proposed Roadmap: Step 4**

Step 1: Develop standardized, universal access to current electricity price

Step 2: Introduce dynamic prices based on real-time, wholesale energy cost (opt-in)

Step 3: Modify prices per real-time, localized grid conditions (opt-in)

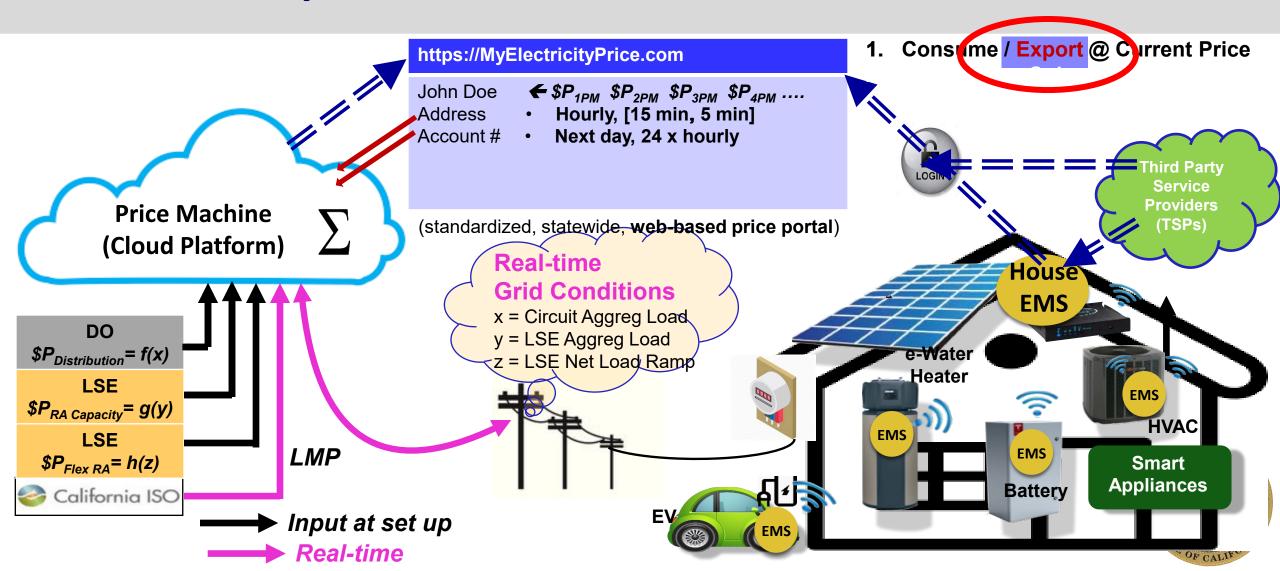
Step 4: Transition to bi-directional prices

Demand Side: unified, universal, dynamic, economic (UNIDE) signal





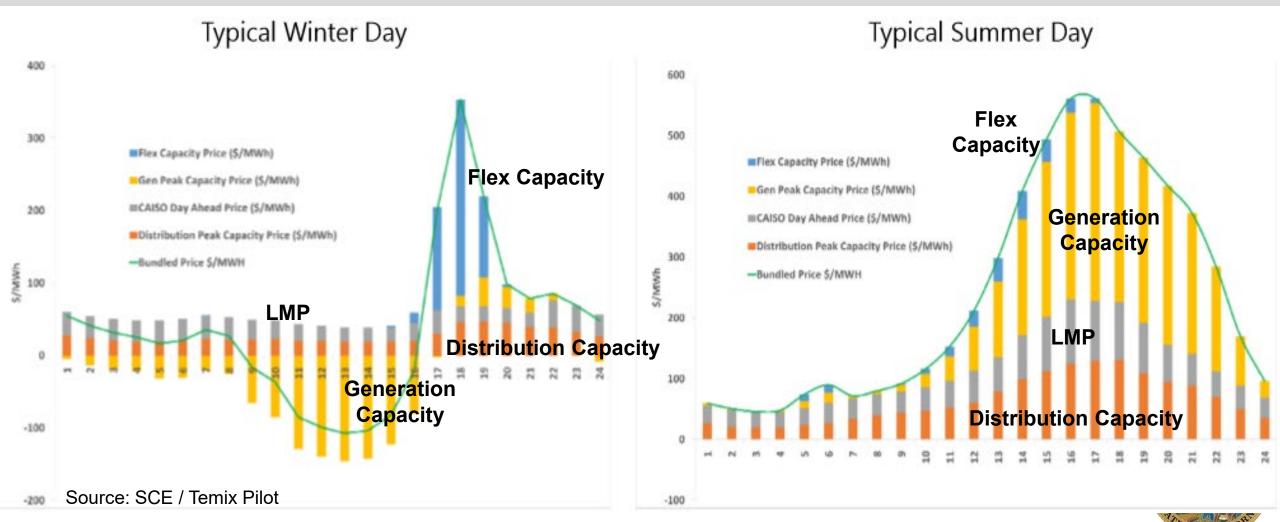
## **Step 4: Transition to Bi-directional Prices**





## **EPIC Pilot: Composite Hourly Prices**

(based on Hourly Capacity Utilization & CAISO LMP)





#### **Step 4: Simplified Framework for DER Valuation & Operations**

1. Easily discoverable, rational, fair, transparent, and predictable economic value





## **Step 4: Simplified DER Valuation & Operations**

- 1. Easily discoverable, rational, fair, transparent, and predictable economic value
- 2. Full monetization of DER services to the grid (locational, temporal), including exports to the distribution grid (embedded capacity value)
- 3. Distributed, economically driven, coordinated, self-dispatch of DERs
- 4. Enables contracts between DER service providers and LSE or Distribution Operator (based on the embedded capacity value), with dispatch driven by UNIDE



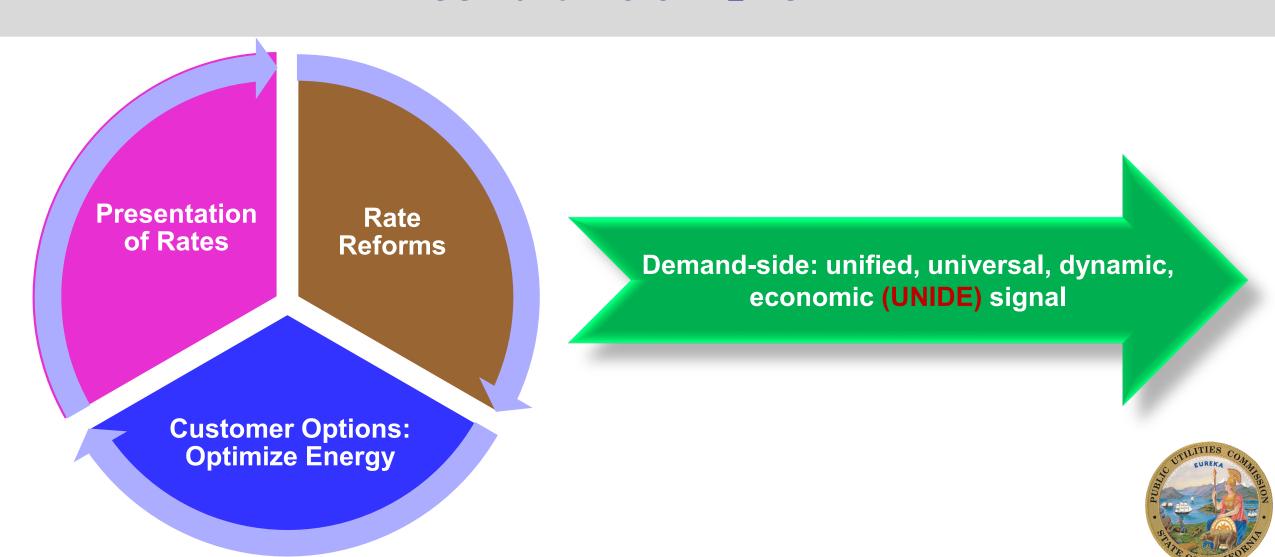
## **Step 4: Avoided Complexities**

- 1. Avoids complexity and constraints of CAISO market integration
- 2. Avoids distribution level "command & control" of DER operations
- 3. Avoids one-off, DER-specific point solutions
- 4. Avoids counterfactual Measurement requirements (direct metering data)
- 5. Avoids reliance on Avoided Cost framework for valuation
- 6. Straightforward integration into the planning & forecast framework
- To do: Streamline, standardize, simplify the Rule 21 export permit process





#### Three Part Vision UNIDE





#### **Proposed Roadmap: Step 5**

Step 1: Develop standardized, universal access to current electricity price

Step 2: Introduce dynamic prices based on real-time, wholesale energy cost (opt-in)

Step 3: Modify prices per real-time, localized grid conditions (opt-in)

Step 4: Transition to bi-directional prices (buy & sell)

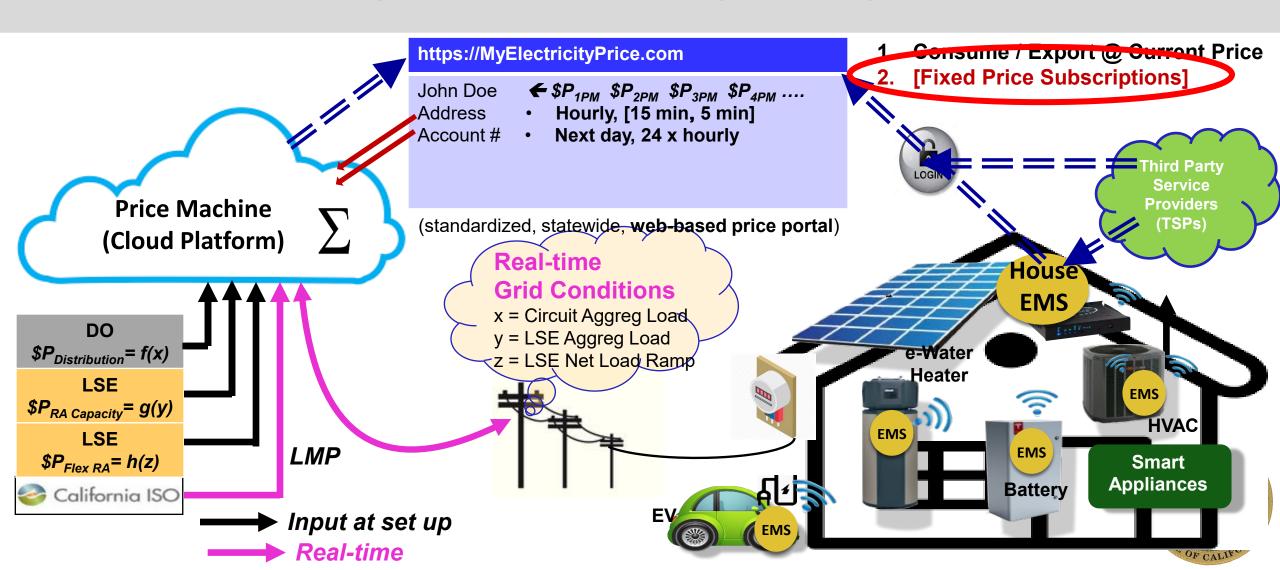
**Step 5: Offer subscription option** 

Demand Side: unified, universal, dynamic, economic (UNIDE) signal



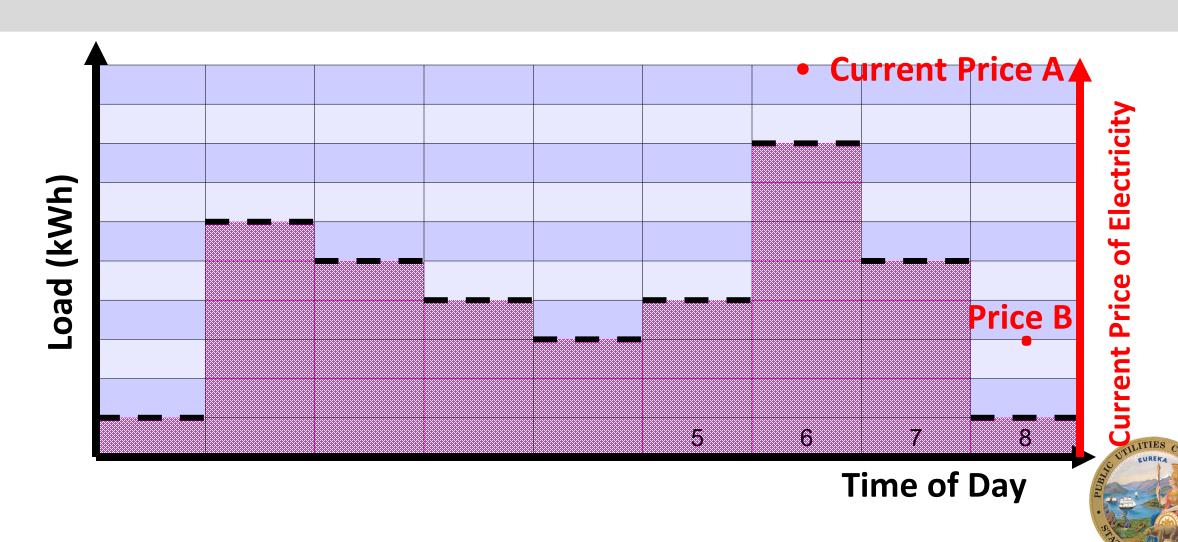


## **Step 5: Offer Subscription Option**



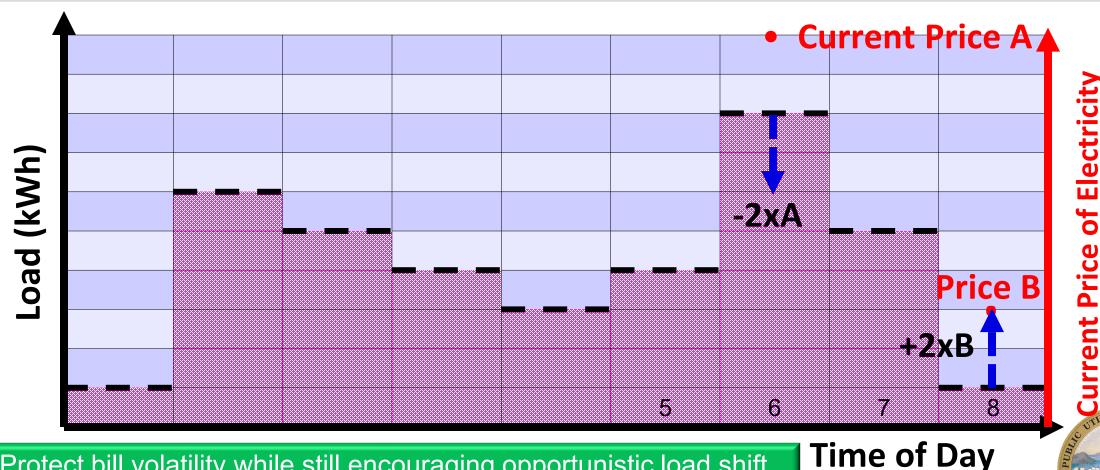


Step 5: Purchase Average Load Shape & Energy Quantity @ Fixed Monthly Price





**Step 5: Purchase Average Load Shape & Energy Quantity @ Fixed Monthly Price** 



→ Protect bill volatility while still encouraging opportunistic load shift



## **Benefits of "Shaped Subscription"**

#### **Protection**

- Protect customers against bill volatility
- Ease customers transition

#### **Flexibility**

- Accommodate changed home conditions
- Encourage opportunistic load shift

#### **Predictability**

 Stabilize revenue recovery for distribution operators, LSEs





## **Proposed Roadmap: Step 6**

Step 1: Develop standardized, universal access to current electricity price

Step 2: Introduce dynamic prices based on real-time, wholesale energy cost (opt-in)

Step 3: Modify prices per real-time, localized grid conditions (opt-in)

Step 4: Transition to bi-directional prices (buy & sell)

Step 5: Offer subscription option (average load shape & energy quantity)

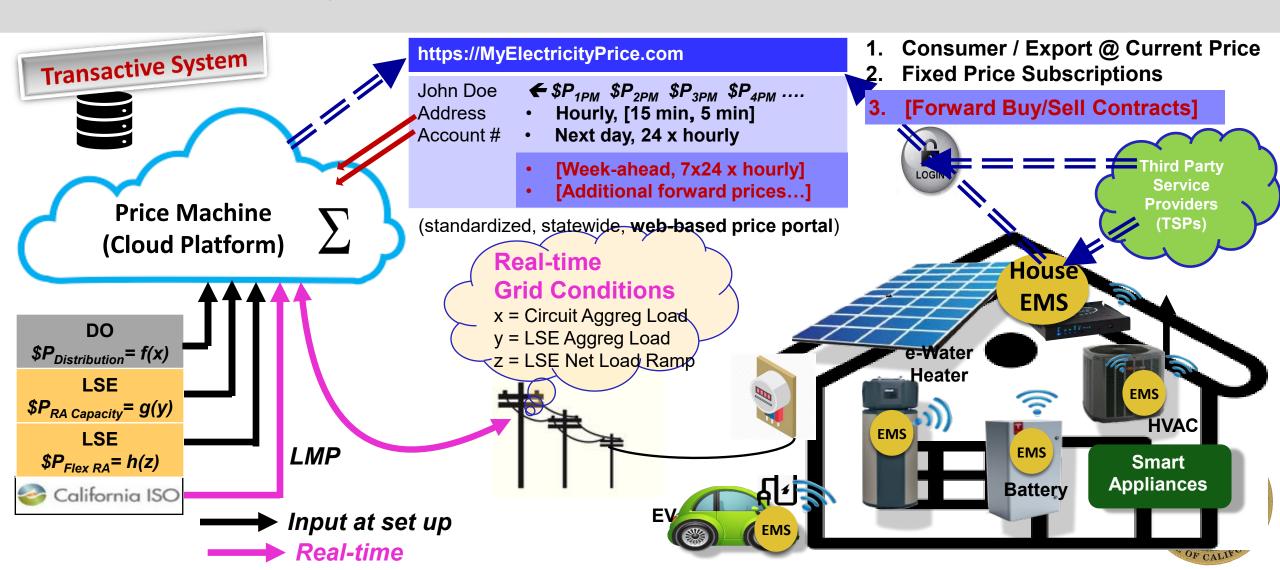
Step 6: Introduce transactive features (ability to lock in price in advance)

Demand Side: unified, universal, dynamic, economic (UNIDE) signal





## **Step 6: Introduce Transactive Features**





#### **Transactive Features are NOT About...**

- Peer to pear trading
- DSO market
- Forcing customers to become market traders
- Forcing customers to deal with price variability
- Blockchain
- Eliminating RA capacity markets
- Obsoleting IOUs or LSEs
- → Options for customers and devices to optimize energy management



#### **Benefits of Transactive System**

# LSEs & Distribution Operators

 Improves visibility, planning, operations

#### **CAISO**

 More visibility, reduce load forecast error

#### **Customers**

 Advanced energy management tools, optimize cost...





## **Proposed Roadmap - UNIDE**

Step 1: Develop standardized, universal access to current electricity price

Step 2: Introduce dynamic prices based on real-time, wholesale energy cost (opt-in)

Step 3: Modify prices per real-time, localized grid conditions (opt-in)

Step 4: Transition to bi-directional prices (buy & sell)

Step 5: Offer subscription option (average load shape & energy quantity)

Step 6: Introduce transactive features (ability to lock in price in advance)

Demand Side: unified, universal, dynamic, economic (UNIDE) signal





#### **Goal: Achieve Widespread Demand Flexibility**

Leverage significant opportunity resulting from electrification, DER adoption

#### **Challenges**

#### Increasing renewables penetration

- Increased curtailment
- Steeper ramps → reliability challenge
- Increased reliance on intermittent, use-limited supply → reliability challenge

## Increasing electrification of end uses (buildings, transportation)

Increased cost of service due to higher load, if unmanaged

#### Increasing DER deployment and adoption

- · Grid instability and increased cost of service, if unmanaged
- Fair compensation and cross-subsidy challenges

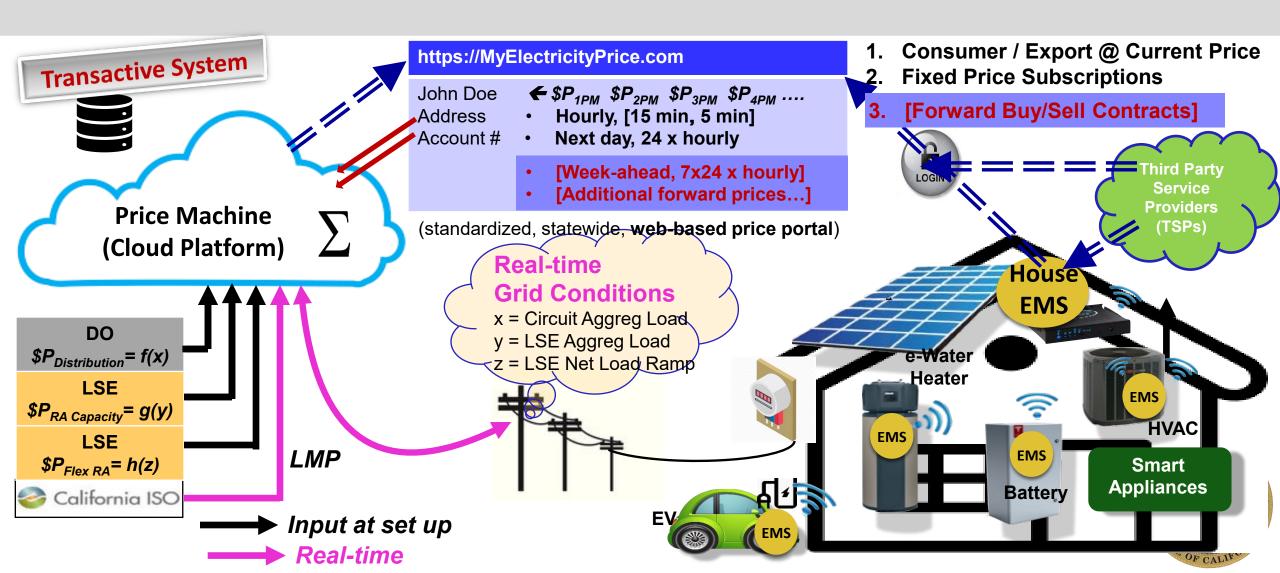
#### **Opportunities**

- → Enhance renewables integration & reduce emissions
- Reduce curtailment
- → Enhance reliability
- Reduce system ramp
- Intermittent supply balanced by dispatchable demand
- Managed coordination of DER operations
- → Minimize cost of service
- Managed load growth and DER operations
- → Provide fair compensation of DER services stack





#### **Q&A**





## **Discussion / Feedback**

- 1. Consumer Advocates: CalPA, TURN, CLECA...
- 2. CCAs, NGOs
- 3. Utilities
- 4. DER Industry
  - a. CESA, CALSSA, CEDMC, CalSEIA
  - b. DR/DER Service Providers
  - c. Transportation
  - d. Building Decarb
- 5. Consultants / Independents
- 6. Government, Research





#### **Contacts**

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