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**Recurve Analytics, Inc - Comment on CEC Working Group Report
on Qualifying Capacity Methodology**

Additional submitted attachment is included below.

RECURVE

Comments: December 20, 2022

CEC Docket: [21-DR-01](#)

Project Title: Supply Side Demand Response - Qualifying Capacity Working Group
Recurve comments on *Commission Report - Qualifying Capacity of Supply-Side Demand Response Working Group Final Report*

Recurve is an industry leader in meter-based demand flexibility. Recurve provides transparent, accessible analytics to track changes in consumption and demand due to program interventions for both individual buildings and in aggregate to support resource planning and facilitate performance-based transactions.

Recurve has been attending the CEC stakeholder working group meetings on qualifying capacity since they were initiated last fall. We support the theme of improved predictability of QC predictions and alignment of performance settlement. Specifically we support the CEC's following recommendations:

1. Adopt an incentive-based approach. As noted in the report *"... an incentive-based approach is the only viable alternative to the status quo LIP approach that was presented for consideration by the working group. The incentive-based approach has previously been recommended by CPUC Energy Division staff and the California ISO Department of Market Monitoring."* This mechanism will improve upon the status quo and create a more manageable pathway for DR providers to be accountable for the resource they deliver.

3. Adopt the ex ante capability profile and ex post regression approach proposed by CEC staff. We agree that the temperature-dependent ex-post-regression approach is still valuable to understanding the performance of the resource. *"The temperature-dependent regression approach accounts for temperature variability during the compliance year and allows more accurate adjustment for weather-sensitive resources."*

6. Eliminate unnecessary reporting requirements for QC determination. We support streamlining reporting requirements.

11. Require DR providers to use the same baseline for settlement and ex post evaluation unless an alternative is more accurate but unable to be used for settlement. We support the continuity between measurement for settlement and ex-post evaluation, but also appreciate the CEC's acknowledgment that this *"is framed as a qualitative guideline rather than a prescriptive standard."* We encourage California state agencies to continue to break down barriers to data access for consistency in performance assessments.

We appreciate the opportunity to participate in the stakeholder process to continue to build a scalable solution for demand side resources to contribute to grid operations.