

DOCKETED

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Enphase Energy Comments on Proposed DSGS Guidelines Revisions

Additional submitted attachment is included below.



February 5, 2024

California Energy Commission
Docket Unit, MS-4
Docket No. 22-RENEW-01
715 P Street
Sacramento, CA 95814

Re: Docket No. 22-RENEW-01 – Enphase Energy Comments on the January 23, 2024 Demand Side Grid Support (DSGS) Program Staff Workshop

Dear Commissioners and Staff:

Enphase Energy, Inc. (Enphase) respectfully submits the following comments in response to the January 23, 2024 DSGS Program Staff Workshop (Workshop), held in California Energy Commission (Commission) Docket 22-RENEW-01. Enphase focuses its comments on the proposal to streamline customer enrollment given prohibitions on dual enrollment.

Enphase is a global energy technology company and market leading supplier of solar microinverters, battery energy storage systems, electric vehicle supply equipment, and home energy management systems that optimize the use of locally produced solar energy to power homes and provide grid services. Enphase has deployed around 3.8 million systems in 145 countries, consisting of 72 million microinverters (representing approximately 25 GW of solar capacity) as well as 1.1 GWh of energy storage systems.¹

Enphase recognizes and appreciates the dedicated efforts of Commission staff to launch, manage, and continuously refine the DSGS program since the adoption of AB 205 in 2022. Enphase is developing an aggregation of residential solar-paired-batteries for planned participation in the Option No. 3 Market Aware Battery Storage VPP Pilot starting in the Summer 2024 delivery season. We therefore concur with staff's intent to improve user experience, reduce operational complexities, and scale and grow participation from clean resources.²

From this vantage, Enphase strongly supports the third proposed modification to Option No. 3, pertaining to participant and aggregator agreements and attestations that prospective participants (and their batteries) are not enrolled in other demand-side management programs (such as the Emergency Load Reduction Program) or as part of a CAISO-integrated Proxy Demand Resource, to the best of their knowledge.³ This solution would dramatically reduce the cost and complexity for aggregators to enroll new customers into the program. Battery manufacturers like Enphase maintain records of all battery systems under control, either by itself or by third parties, for purposes of Demand Response or other grid services programs. We are confident that these records, combined with a customer attestation of non-participation in competing programs, will provide sufficient assurance that prospective customers are not enrolled in programs beyond DSGS that would erode the value of the capacity product being delivered via DSGS.

Enphase appreciates the Commission's consideration of these comments and respectfully urges it to include this streamlined dual participation check in its February Draft Modified Guidelines.

¹ <https://investor.enphase.com/static-files/7a95029a-a55b-4f1a-8fe1-5b3c41fef946?v=october-2023>, Slide 4

² Workshop presentation, slide 9.

³ Workshop presentation, slide 15.



Respectfully submitted,

/s/ Marc Monbouquette

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