

DOCKETED

Docket Number:	22-RENEW-01
Project Title:	Reliability Reserve Incentive Programs
TN #:	255228
Document Title:	PowerFlex Comments_DSGS Proposed Changes_3rd Edition
Description:	N/A
Filer:	System
Organization:	PowerFlex Inc
Submitter Role:	Public
Submission Date:	3/22/2024 12:56:37 PM
Docketed Date:	3/22/2024

Comment Received From: PowerFlex Inc
Submitted On: 3/22/2024
Docket Number: 22-RENEW-01

PowerFlex Comments_DSGS Proposed Changes_3rd Edition

Additional submitted attachment is included below.



March 22, 2024

California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, CA 95814

Re: Docket No. 22-RENEW-01—PowerFlex Comments on Demand Side Grid Support (DSGS) Program Proposed Draft Guidelines, Third Edition

California Energy Commissioners and Staff:

PowerFlex appreciates the opportunity to comment on the California Energy Commission's (Commission's) Demand Side Grid Support (DSGS) Program Proposed Draft Guidelines, Third Edition. PowerFlex was very supportive of creating DSGS Option 3 and participated six sites comprising 3.2 MW in that option in 2023. With this experience, PowerFlex offers the following comments on the Commission's proposed changes for the 2024 season.

Include Electric Vehicle-to-Building or Grid (V2X)

PowerFlex strongly supports the Commission's proposal to include vehicle-to-building or grid (V2X) resources in Option 3. PowerFlex agrees with the Commission that V2X resources should measure performance on how the resources discharge during events without using baselines and that resources should be measured at the device level, as battery storage is currently treated in Option 3. PowerFlex believes that allowing V2X resources to participate in DSGS Option 3 will encourage these resources to respond to events and provide reliability to the grid, unlocking massive potential for bidirectional vehicles to provide grid services in the coming years.

Day-Of Event Triggers

PowerFlex appreciates the Commission's proposal to postpone day-of event triggers until the 2025 program year, giving industry time to prepare for this change. To implement day-of triggers in a way that meets the Commission's goals and is clear to industry, PowerFlex requests that the Commission host workshops and solicit comments during the 2024 program year and provide updated program guidelines at the end of the 2024 calendar year. Details on day-of trigger impacts to resource valuation, compensation, dispatch, etc. could be covered and developed in these workshops.

PowerFlex appreciates the opportunity to provide these comments in response to the Commission's DSGS Proposed Draft Guidelines and looks forward to future collaboration on this program.

Respectfully,

A handwritten signature in black ink that reads "Raghav Murali". The signature is written in a cursive, flowing style.

Raghav Murali
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PowerFlex Inc.