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**CALIFORNIA
ENERGY COMMISSION**



PROGRAM GUIDELINES

Demand Side Grid Support (DSGS) Program Guidelines, Fifth Edition

(Assembly Bill 205, Assembly Bill 209, 2022)

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California Energy Commission

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DISCLAIMER

These proposed guidelines are anticipated to be considered by the California Energy Commission (CEC) after considering public comments. The requirements in these guidelines are based on applicable law, including Public Resources Code Section 25792 and Section 18 of Assembly Bill 205 (Ting, Chapter 61, Statutes of 2022), as well as staff analysis and public input. As a staff proposal, the proposed draft guidelines do not represent the views of the CEC or of the State of California. This draft document has not been approved or disapproved by the CEC, nor has the Energy Commission passed upon the accuracy or adequacy of the information in this document.

PREFACE

The state created the Demand Side Grid Support (DSGS) Program as part of the statewide Strategic Reliability Reserve (SRR) to develop clean, demand-side resources capable of reducing net-peak demand during extreme events. The DSGS Program was originally envisioned as a \$314 million program to build 1 GW of demand-side resources for the state by 2030. To date, only \$109.5 million has been allocated to the program with no new funding allocations authorized in the 2025-26 Budget. Additionally, in 2023, in response to a directive in Senate Bill 846 (Dodd, Chapter 239, Statutes of 2022), the CEC, in consultation with the California Public Utilities Commission and California Independent System Operator (ISO), established a statewide load flexibility goal of 7,000 MW by 2030.¹ In support of California's transition to 100 percent clean energy, the DSGS Program seeks to grow clean, load-flexible resources under the SRR without interfering with resource adequacy, as well as act as a sandbox to scale demand flexibility solutions for achieving the statewide load flex goal.

The DSGS Program launched in August 2022 with an emergency load reduction participation option and enrolled 44 individual participants to help respond to the September 2022 extreme heat event, providing over 3,100 MWh of load reduction. These resources were vital for allowing the state to maintain grid reliability during the 2022 heat event. The program has continued to expand participation opportunities in each year of its existence targeted toward growing clean demand side resources for SRR, including California ISO market-integrated demand response incremental capacity, a market-aware behind-the-meter storage virtual power plant (VPP), and an emergency load flexibility VPP focused on smart thermostats and heat pumps. In just three years, the DSGS Program has expanded to four participation options with over 448,000 participants and an estimated 1,145 MW enrolled, with nearly 1GW from clean resources. It has been reported to include the world's largest storage VPP with over 124,000 customers enrolled throughout the state.

During the design and early implementation of the DSGS Program, CEC staff – working with its colleagues across state agencies, industry, and other stakeholders, and embracing the learnings from its sandbox – have identified challenges and areas of opportunity for improvement under the program that warrant exploration, discussion and feedback in a public process. However, given the uncertainty around the program's long-term funding and the quickly approaching 2026 program season, this guideline revision is limited to essential modifications to provide clarity on program requirements, incorporate lessons learned on incrementality, and align with the program's goals and current funding level. If additional funding is authorized for the program to continue beyond the upcoming 2026 program season, CEC staff will engage in further analysis

1 <https://www.energy.ca.gov/publications/2023/senate-bill-846-load-shift-goal-report>.

and public dialogue to explore additional opportunities and challenges raised to ensure DSGS effectively meets its goals.

ABSTRACT

These program guidelines for the Demand Side Grid Support (DSGS) Program establish the rules for the program, including eligibility requirements, participation process, and participation options. Created by Assembly Bill (AB) 205 (Ting, Chapter 61, Statutes of 2022) and expanded by Assembly Bill 209 (Ting, Chapter 251, Statutes of 2022) as part of the Strategic Reliability Reserve, the DSGS Program provides performance-based payments to reduce customer net-energy load during extreme events with upfront capacity commitments and per-unit reductions in net load.

Keywords: AB 205, AB 209, Strategic Reliability Reserve, DSGS, load reduction, extreme event

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What's New in These Guidelines?

This section summarizes the changes in the Demand Side Grid Support (DSGS) Program Guidelines, Fifth Edition, as compared with the Fourth Edition (April 2025).

Chapter 1: Program Overview

This chapter:

1. Establishes that Option 1 is suspended for the 2026 program year.
2. Includes updates on the program budget and restrictions on program spending in 2026.
3. Specifies that after the 2026-2027 budget process, the CEC will evaluate if any modifications to the guidelines are necessary.
4. Makes clarifying changes, including language to reflect that program options are participation options rather than incentive options.

Chapter 2: Eligibility and Participation

This chapter:

1. Clarifies dual compensation prohibition and provides examples of prohibited dual compensation.
2. Clarifies that load reduction resources at the same site may participate in different participation options under different providers.
3. Updates Option 4 enrolled participation report due date to five business days before the start of each month.
4. Requires Option 3 participation reports to include number of inverters per site instead of batteries per site.
5. Clarifies that Option 3 and Option 4 providers attest to: having remote control of participant devices, not dispatching for conflicting programs, and having no knowledge of participant device enrollment in conflicting programs.
6. Clarifies that new enrollment applications are not needed every year, unless a provider is updating information or enrolling in a new participation option.
7. Provides that Option 3 participation in the 2026 program season is limited to storage VPP aggregators that participated in 2025, except for aggregators of bi-directional EVSEs.
8. Updates requirements for Option 3 performance report submissions to be able to establish baselines.

9. Requires Option 4 providers to attest they have no knowledge or awareness that each participant device was enrolled in a resource adequacy program in the 2024 – 2026 calendar years.
10. Makes other clarifying changes, including language to reflect that program options are participation options rather than incentive options.

Chapter 3: Participation Option 1: Emergency Dispatch

This chapter:

1. Notes that Option 1 is suspended for the 2026 program year.
2. Removes reference to a controllable generation incentive previously removed from the program.
3. Makes clarifying changes, including language to reflect that program options are participation options rather than incentive options.

Chapter 4: Participation Option 2: Incremental Market-Integrated Demand Response Capacity Pilot

This chapter:

1. Sets total compensation amount available for Option 2 in 2026 and describes the mechanism to cap performance-based capacity payments for each provider.
2. Removes the option for providers to request an interim season settlement payment.
3. Makes clarifying changes, including definition of “aggregation” and language to reflect that program options are participation options rather than incentive options.
4. Clarifies minimum dispatches must result in a non-zero BNLI value in order to qualify for a demonstrated capacity value for the season.
5. Removes reference to a waiver of the three-hour minimum dispatch requirement available in 2024.

Chapter 5: Participation Option 3: Market-Aware Storage Virtual Power Plant Pilot

This chapter:

1. Adds customer class to the definition of “aggregation”; removes reference to VPPs consisting of both residential and non-residential customers.
2. Updates participant enrollment information consistent with updated eligibility and baseline methodology.
3. Clarifies that service address and SAID must be valid.
4. Clarifies that payments are performance-based capacity payments.

5. Sets total compensation amount available for Option 3 in 2026 and describes the mechanism to cap performance-based capacity payments for each provider.
6. Limits participation in the 2026 program season to storage VPP aggregators that participated in October 2025, except for VPP aggregators of bi-directional EVSE.
7. Updates maximum event requirements to switch to a specific number of hours.
8. Establishes that the CEC may require Option 3 aggregators with large aggregations to conduct their test events in PG&E and Southern California territories on different days.
9. Establishes that the CEC and California ISO will collaborate with large aggregators to explore, develop, and implement technical solutions to help mitigate potential system impacts that may be associated with dispatches of large aggregations.
10. Requires a three-consecutive day test event in August.
11. Clarifies that subsequent energy emergency alerts do not affect the selection of day-of event hours.
12. Updates the baseline method to a measured baseline.
13. Makes other clarifying changes, including language to reflect that program options are participation options rather than incentive options.
14. Updates the minimum aggregation size.
15. Establishes that submeter data is required for all participating resources for all months of their participation and the month immediately preceding each month of participation.
16. Establishes that CEC staff may explore, develop, and implement, in consultation and collaboration with the California ISO and select interested aggregators, a process or mechanism to facilitate the integration of some Option 3 VPP resources (offered by interested aggregators) into the California ISO energy markets in support of a California ISO staff proposal that incorporates a pathway for exports by BTM distributed energy resources to be monetized in energy markets.

Chapter 6: Participation Option 4: Emergency Load Flexibility Virtual Power Plant Pilot

This chapter:

1. Provides a pathway and deadline for submitting other load reduction resources for consideration.
2. Clarifies that EVSE resources could participate in Option 4 via managed charging only and do not need to be bi-directional.
3. Clarifies that payments are performance-based capacity payments.

4. Requires new aggregations to enroll and begin participation at the beginning of the program season or at the beginning of the second quarter.
5. Establishes an enrollment cap for the 2026 program season and describes the mechanism to address over-subscription.
6. Clarifies the method for measuring performance.
7. Provides a description of method to calculate utility distribution company (UDC) planning temperature.
8. Updates the calculation of daily temperature average to align with the program's event window and variable is renamed to Daily Average Temperature (TDAv).
9. Clarifies day-of adjustment value calculation.
10. Clarifies the definition of "similar days" for weather sensitive resources.
11. Makes other clarifying changes, including language to reflect that program options are participation options rather than incentive options.
12. Updates the minimum aggregation size.

13. Extending the Aggregator's enrollment participation report due 5 business days before the participating month from 3 business days.

Chapter 7: Program Payments

This chapter:

1. Requires a provider's officer to sign attestations in claim forms.
2. Removes reference to a controllable generation incentive previously removed from the program.
3. Makes clarifying changes, including language to reflect that program options are participation options rather than incentive options.

Chapter 8: Administration

This chapter:

1. Adds more detail regarding the process for requesting records be designated confidential according to the CEC's regulations for confidential designation, Title 20, California Code of Regulations, Section 2505.
2. Clarifies that CEC is not obligated to provide funding or payments under the DSGS Program beyond CEC's authorized funding limitations.

Glossary

This chapter:

1. Clarifies definition of “aggregator.”
2. Adds a definition of “holidays” for use in energy baseline calculations.
3. Adds a definition for Maximum Committed Capacity (MaxCC).

Appendix A

This chapter is added to provide detailed descriptions of the calculation methods referred to in Chapters 4 – 6, including funding and enrollment allocations for Options 2, 3, and 4 for the 2026 program season.

CHAPTER 1:

Program Overview

A. Summary of Key Program Design Elements

Created by Assembly Bill (AB) 205 (Ting, Chapter 61, Statutes of 2022) as part of the Strategic Reliability Reserve, the Demand Side Grid Support (DSGS) Program compensates eligible customers for reductions in net load during extreme events (as defined in Public Resources Code [PRC] Section 25790.5[b]) achieved through reduced usage or use of backup generation or both.

The DSGS Program has four participation options. Participants can select different participation options for each eligible load reduction resource type. Participants may enroll with eligible DSGS providers or, in limited circumstances, directly with the CEC. The four participation options include:

- Option 1: Emergency Dispatch
- Option 2: Market-Integrated Demand Response Incremental Capacity Pilot
- Option 3: Market-Aware Storage Virtual Power Plant Pilot
- Option 4: Emergency Load Flexibility Virtual Power Plant Pilot

Participation Option 1 is suspended for the 2026 program year due to the program's current budget constraints.

B. Background

[AB 205](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB205), available at

https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB205, requires the CEC to implement and administer the DSGS Program, codified under PRC Section 25792, to incentivize dispatchable customer load reduction and backup generation operation as on-call emergency supply and load reduction for the state's electrical grid during extreme events. [Assembly Bill 209](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB209) (Ting, Chapter 251, Statutes of 2022), available at

https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB209, expanded the eligibility of the DSGS Program to include all energy customers in the state, except those enrolled in demand response or emergency load-reduction programs offered by entities under the jurisdiction of the California Public Utilities Commission (CPUC). AB 209 also states that the CEC, in consultation with the CPUC, may adopt additional participation requirements or limitations.

The DSGS Program provides incentives to reduce customer net load during extreme events with performance-based payments. As part of the state's Strategic Reliability Reserve established in AB 205, the DSGS Program aims to support electric grid reliability

beyond normal planning standards by providing incremental load reduction during extreme events, such as heat waves.

Section 18 of AB 205 authorizes the CEC to adopt guidelines for the DSGS Program. Furthermore, PRC Section 25792(e) directs the CEC to develop guidelines to determine when to implement the program, including which resources are dispatched first to minimize local pollution and emissions of greenhouse gases.

C. Program Budget

DSGS Program funding is authorized under AB 205, AB 102 (Ting, Chapter 28, Statutes of 2023), AB 107 (Gabriel, Chapter 22, Statutes of 2024) and Senate Bill 108 (Wiener, Chapter 35, Statutes of 2024) with an overall budget of \$109.5 million. Additional funding may become available for the DSGS Program through the 2026-2027 budget process.

Except for the 2026 program year, there is no specific restriction on annual spending or allotments for enrolled DSGS providers. Due to budget constraints based on appropriations to date, the guidelines include funding limits and certain participation restrictions for the 2026 program year. To the extent the DSGS Program budget is revised in the 2026-2027 budget appropriation process, the CEC may revisit the limits and restrictions as appropriate. The CEC will provide estimates and updates of DSGS Program expenditures and available funding annually once activity is reconciled.

CHAPTER 2:

Eligibility and Participation

This chapter contains the program wide eligibility criteria and establishes the process for participating in the program options, including enrollment and reporting.

DSGS participation options are designed and intended to grow and deliver load reduction capacity that is incremental to resource adequacy and California ISO and CEC forecasts, while avoiding interference with resource adequacy or energy markets.

A. DSGS Program Eligibility

1. Eligible DSGS Providers

Eligible DSGS providers include:

- a. Retail suppliers as defined in Public Utilities Code (PUC) Section 398.2.
- b. Federal power marketing administrations.
- c. Aggregators of customers.
 - i. Before enrolling customers in the service territory of a publicly owned electric utility (POU), aggregators of customers must notify the POU of their intent to enroll customers within the service territory of the utility by providing the information required in Section A.1.c.ii below and obtaining a written statement from each applicable POU that the POU:
 - Does not object to the aggregator enrolling the POU's customers to participate in the DSGS Program.
 - Will provide the aggregator the data necessary for the aggregator to administer the DSGS Program, as determined by the POU, subject to the aggregator (1) receiving authorization from participants and (2) entering into a data-sharing agreement with the POU, if required.
 - Understands incurred costs associated with the DSGS Program pursuant to Chapter 7, Section B, are reimbursable.

Aggregators must provide the CEC a copy of this statement within five business days of receipt. POU's may establish terms and conditions for aggregators to enroll the POU's customers to participate in the DSGS Program, including protocols for communicating and coordinating with the POU regarding program events and the circumstances under which the POU may grant or revoke the aggregator's ability to enroll the POU's customers in the DSGS Program.

- ii. Aggregators of bundled and unbundled customers must notify investor-owned utilities (IOUs) and community choice aggregators (CCAs) in writing of their

intent to enroll customers within the service territory of the respective load-serving entity. The notice shall include:

- The aggregator's name.
- The DSGS participation option(s) the aggregator will offer to participants.
- A description of the types of customers (such as residential, commercial, industrial, and so forth) and load reduction resources the aggregator plans to enroll in each participation option.

Aggregators must provide the CEC evidence of this notice within five business days of sending to the IOU or CCA.

Participation Options 2, 3, and 4 include additional DSGS provider eligibility requirements described in Chapter 4, Section A, Chapter 5, Section A, and Chapter 6, Section A.

2. Eligible DSGS Participants

- a. Eligible participants are:
 - i. All customers of POU's.
 - ii. All customers of federal power marketing administrations.
 - iii. The following customers of CCAs, energy service providers, and electrical corporations:
 - Customers participating with backup generators.
 - Customers participating through participation Option 2, Option 3 or Option 4 described in Chapter 4, Chapter 5, and Chapter 6, respectively.
 - Water agencies, which include water utilities, wastewater facilities, and irrigation districts.
 - iv. All customers of tribal utilities.
- b. DSGS providers may include additional eligibility requirements for their participants.
- c. Customers must also meet the eligibility requirements specific to the participation option in which they are enrolled, as described in Chapters 3–6.

B. DSGS Participation Highlights

1. Participation Options

- a. The DSGS Program has four participation options summarized below and described further in Chapters 3–6:
 - i. Option 1: Emergency Dispatch offers energy and standby payments to nonresidential customers that reduce net load during program events triggered based on energy emergency alerts issued by a California balancing authority. Eligible technologies include combustion resources, subject to emergency proclamation, and clean, non-combustion resources.

- ii. Option 2: Market-Integrated Demand Response Incremental Capacity Pilot offers a capacity payment based on demonstrated capacity by California Independent System Operator (California ISO) dispatched proxy demand resources that is incremental to existing resource adequacy commitments.
- iii. Option 3: Market-Aware Storage Virtual Power Plant (VPP) Pilot offers a capacity payment for behind-the-meter storage VPPs based on demonstrated capacity. Program events are triggered based on day-ahead California ISO energy market prices exceeding a specified price threshold, but the VPP capacity is not actually bid into the energy market. An energy incentive is available for VPPs that respond to a day-of emergency.
- iv. Option 4: Emergency Load Flexibility VPP Pilot offers capacity-based compensation for load reduction capacity committed by dispatchable VPPs composed of aggregated smart thermostat-controlled HVAC systems, electric water heaters, electric vehicle supply equipment (EVSE), stationary batteries, and residential “smart electrical panels.” Program events are triggered based on energy emergency alerts issued by a California balancing authority.

Participation Option 1 is suspended for the 2026 program year due to budget constraints.

- b. Staff report: Participation Options 2, 3, and 4 are pilot participation pathways intended to test new program designs. The CEC staff may prepare a report assessing the performance and cost-effectiveness of these pilots.
- c. Participation flexibility: Participants may select a different participation option and a different provider for each of their load reduction resources located at the same site, provided each load-reduction resource has dedicated or distinctly identifiable metering. A load reduction resource cannot be enrolled in more than one participation option.. DSGS providers may limit which participation options are available to their participants. All load reductions that would not have occurred in the absence of the DSGS Program, including those that result in negative load at the utility meter (that is, exports), are eligible for compensation.
- d. Dual-compensation prohibition: A participant is prohibited from receiving compensation for incremental performance² (also referred to as “demonstrated capacity”, as defined in these guidelines for DSGS participation option 3 & 4, and “incremental demonstrated capacity”, as defined in these guidelines for DSGS participation option 2) attributed to the participant’s load-reduction resource enrolled in DSGS, if the participant’s load reduction resource:
 - i. Is also enrolled in the Emergency Load Reduction Program (ELRP) or the Base Interruptible Program (BIP) or the Agricultural Pump Interruptible (API) Program.

² Performance could be achieved through reduction in electricity consumption or increase in energy export, as applicable.

- ii. Receives compensation for the same incremental performance through any other utility, CCA, load-serving entity (LSE), or state program designed to procure demand response, net load reduction, or grid services during an interval that coincides or overlaps with the DSGS event interval, except the utility, CCA, or LSE rate plan applicable to the load reduction resource.
- iii. Is a cogeneration facility with a power purchase agreement.³

2. POU Participation Outside the California ISO Balancing Area

POUs outside the California ISO balancing area may develop alternative POU-specific “custom” dispatch requirements and associated performance measurement criteria to those described in Chapters 3–6 if the requirements are suitable to the operations of the applicable balancing authority and contribute to grid reliability within its balancing area. The alternative “custom” proposal may also include a different incentive structure, provided the total incentive rate is not higher than the incentives in Chapters 3–6. The POU “custom” proposal may allow the POU itself, third-party providers, or both to participate as DSGS providers.

POUs outside the California ISO wishing to submit “custom” proposals must submit a description of the proposed incentive structure, dispatch requirements, and performance measurement criteria to the CEC for approval. POUs outside the California ISO may submit a “custom” proposal at any time, but participants may not enroll to participate in the proposed incentive structure unless the CEC has approved the proposal.

C. DSGS Enrollment Process

1. DSGS Provider Enrollment Process

DSGS providers enroll in the program by electronically submitting an application to the CEC. New applications are not required each year unless updating information or offering a new participation option.

For Option 3, due to budget constraints, participation in the 2026 program season is limited to storage VPP aggregators that participated in October 2025, except for VPP aggregators of bi-directional EVSEs.

a. DSGS Provider Application Timing

Applications are accepted on an ongoing basis.

- i. The date and time the CEC receives the electronically submitted complete application will establish the order in the queue for review of DSGS provider applications.

³ If a participant has a power purchase agreement for a renewable generator at the same site as a cogeneration facility, but not one for the cogeneration facility, this does not make the participant ineligible to participate.

- ii. The CEC will notify applicants if the application is incomplete. The applicant will have 10 business days to supplement the incomplete application. Failure to respond within the 10 business days will result in the cancellation of the application.
- iii. The cancellation of an application does not preclude an applicant from reapplying.

b. DSGS Provider Application Package

Applicants to be DSGS providers must submit to the CEC the following information in a format provided by the CEC:

- i. Legal name of the applicant
- ii. Applicant's contact name, title, address, email address, and phone number
- iii. Description of how applicant will verify which load-reduction resources are used by participants
- iv. Description of how the applicant will verify participant eligibility prior to enrollment of participants
- v. The DSGS participation options the applicant will offer to participants
- vi. If offering Participation Option 1:
 - Description of how the applicant will implement the dispatch loading order requirements described in Chapter 3, Section D
 - Description of how the applicant will verify actual incremental load reduction amounts, including the DSGS provider's method for determining energy-use baselines and actual energy usage during a DSGS program event
 - Indication of which administrative cost structure described in Chapter 7, Section B, the DSGS provider has chosen
- vii. If offering Participation Option 2:
 - Description of how the applicant meets the eligibility requirements specific to the participation option and how the applicant plans to implement the program under the participation option, including details on how the applicant will allocate incentives to participants
 - California ISO Demand Response Provider ID (DRP ID) and an attestation that the DRP has active proxy demand resources (PDRs)
- viii. If offering Participation Option 3:
 - Description of how the applicant meets the eligibility requirements specific to the participation option and the applicant's plans to implement the

- program under the participation option, including plan to allocate incentives to participants
- Description of the applicant’s plans to implement quality control on submetered charge and discharge data, including minimum standards for data completeness and quality
- ix. If offering Participation Option 4:
 - Description of how the applicant meets the eligibility requirements specific to the participation option and the applicant’s plans to implement the program under the participation option, including plans to allocate incentives to participants
 - Description of the applicant’s plans to implement quality control on device-level load data or smart thermostat runtime data, including minimum standards for data completeness and quality
- x. If the applicant is an aggregator of participants:
 - A description of the types of customers (such as residential, commercial, industrial, and so forth) and load-reduction resources the applicant plans to enroll and the utility territories in which the DSGS provider plans to operate
- xi. Payee data record (STD-204). If the designated payee has already submitted a complete STD-204 form with a prior reimbursement claim and has received a payment within the past year from the CEC, a new STD-204 is not needed.
- xii. Verification in writing of the accuracy and completeness of the information submitted and agreement to the terms and conditions of the DSGS Program guidelines.

c. Application Review and Approval

The CEC will review applications to determine completeness and eligibility. After approving a complete DSGS provider application, the CEC will provide an electronic DSGS Program enrollment letter to the DSGS provider.

d. Withdrawal

A DSGS provider can voluntarily withdraw from the program, subject to applicable conditions specific to the participation option, by notifying the CEC electronically in writing. Voluntary withdrawal from the program does not preclude the DSGS provider from reapplying in the future or from submitting a claim pursuant to Chapter 7 for program participation prior to withdrawal. Withdrawal from the program will result in the removal of all of the DSGS provider’s enrolled participants from the program.

2. Participant Enrollment Process

a. How to Enroll

Except as outlined in the following paragraph, eligible participants must enroll to participate in the DSGS Program through a DSGS provider.

An eligible participant may enroll directly with the CEC only to participate under Participation Option 1 and only if enrollment through the participant's load-serving entity is not possible. For example, if the load-serving entity is not enrolled as a DSGS provider or is not offering DSGS Program participation for that type of customer or load reduction resource. A POU customer participant must obtain a written statement from its POU stating that the POU does not object to the participant enrolling directly in the DSGS Program. The CEC will work with the participant's load-serving entity, as appropriate, to confirm eligibility as soon as practicable.

The required application information for each participation option is described in Chapters 3–6.

b. Withdrawal

A participant can voluntarily withdraw from the program by notifying the DSGS provider or the CEC if directly enrolled in the program. Voluntary withdrawal from the program does not preclude the participant from reapplying in the future or from submitting a claim pursuant to Chapter 7 for program participation prior to withdrawal.

D. DSGS Program Reporting

1. Enrolled Participation Reports

a. Initial Report Due Date

Within 10 business days of the DSGS provider's enrollment, or as soon as practicable, DSGS providers must submit to the CEC an initial report on enrolled participation with the information required in Sections 1.c, 1.d, 1.e, and 1.f, as applicable.

b. Ongoing Reporting Due Dates

DSGS providers must submit to the CEC updated enrolled participation reports as detailed below. If a site is not included in a participation report, that site may not be included in performance calculations for the period that is covered by that participation report.

- Participation Option 1: No later than three business days before the first day of the program season (May–October) and within five business days after any changes to participants enrolled or expected load-reduction resources.

- Participation Option 2 and Option 3: No later than three business days before the first day of each month for all enrollments effective the first calendar day of that month.
- Participation Option 4: No later than five business days before the first day of each month for all enrollments effective the first calendar day of that month. Reports for May 2026 are due no later than April 28, 2026.

Only complete participation reports using the most recent report template version will be accepted. Reporting templates are available on the [Resources page](#) of the DSGS Program website at <https://dsgs.olivineinc.com/resources/>.

c. Participation Report for Participation Option 1

The initial report of the program season must include the following information on each participant enrolled under Participation Option 1, segmented by host utility and balancing authority, in a format provided by the CEC:

- Legal name of the participant
- Participant contact's name, title, email address, and phone number
- If the participant is enrolling with an aggregator or the CEC: applicable utility distribution company (UDC) and LSE, customer identification number (such as service account identification number), phone number on file with the load-serving entity, or any other information necessary to verify participant eligibility with the load-serving entity, as appropriate.
- Information on the load-reduction resources the participant will use during a DSGS Program event, including:
 - Types of available resources, including the applicable loading order category (for example, demand response, renewable or zero-emission resource, near-zero-emission resource, biomethane or natural gas resource, or diesel backup generator or other conventional resource, or any combination of the above).
 - Address and customer identification number where the participant will deploy each resource.
 - Expected minimum and maximum load reduction amount (in kilowatts [kW]) for each resource.
 - Whether the resource may require a 202(c) emergency order pursuant to the Federal Power Act to participate in the DSGS Program.
 - If the resource is a backup generator, information on whether the backup generation is portable or stationary, rated horsepower, fuel type used, and federal emissions tier.
 - Notice time and ramp time required to respond to a DSGS event.

d. Participation Report for Participation Option 2

- California ISO Resource ID(s) for all resources under the aggregator enrolled in DSGS
- Number of end-use customers and customer class, sector, or load type of customers for each Resource ID
- Estimated incremental capacity not shown on any supply plan or other resource adequacy commitment

e. Participation Report for Participation Option 3

- Information on each participating site, including a unique identification number, partner company (if applicable), nominated duration (hours), customer class, valid utility service account number (for example, service agreement ID) or service account address or both, UDC, resource type (stationary default, stationary export-only, stationary VNEM, or EVSE), number of inverters installed at each site, nameplate (that is, usable) battery system power rating (for nonvehicle behind-the-meter [BTM] storage) or nameplate discharge power rating for electric vehicle supply equipment (EVSE), nameplate storage energy capacity (for stationary storage devices, in kWh), and estimated full duration event discharge (kWh).
- Attestation that the DSGS provider or its partner has remote control (for example, via Application Programming Interface (API) access) of each participant storage device to dispatch the device, is not dispatching the storage device for a conflicting program, and has no knowledge or awareness that the participant storage device is enrolled or participating in a conflicting program.

f. Participation Report for Participation Option 4

- The UDC service territory and device type for each aggregation participating in the DSGS Program. DSGS providers should submit no more than one entry for each combination of UDC and device type.
- Information on each participating device, including a unique identification number, device type, utility service account number (for example, service agreement ID) or service account address or both, UDC, and connected load estimate. The connected load estimate shall be entered as 2.5 kW for smart thermostats without direct load measurement or the estimated maximum instantaneous power draw of the device otherwise.
- Attestation that the DSGS provider has remote control (for example, via API access) of each participant device to dispatch the device, is not dispatching the device for a conflicting program, and has no knowledge or awareness that each participant device is enrolled or participating in a conflicting program.
- Attestation that the DSGS provider has no knowledge or awareness that each participant device was enrolled in a resource adequacy program in the 2024 – 2026 calendar years.

2. Option 2 Dispatch Reports

Option 2 providers must submit to the CEC a monthly report summarizing the total expected energy (MWh) by Resource ID for each day and hour. Dispatch reports are due to the CEC 10 business days after the last day of the month in which dispatches occurred. If no eligible dispatches occurred in the previous month, the report should indicate that no dispatches occurred in the past month.

3. Option 3 Performance Reports

Within 15 business days after the end of each month during the program season (May–October), Option 3 providers must submit to the CEC (a) submeter or inverter data in the specified format for the prior two months (if not already submitted) for all sites participating in their aggregation that month and (b) electric utility meter data in 15-minute intervals for sites also enrolled in a supply-side demand response program and participating in DSGS with an export-only resource. For example, for all sites enrolled in May, the submeter data submitted in June must include complete data for all of April and May. For sites that are enrolled in June and were not already enrolled in May, the submeter data submitted in July must include complete data for all of May and June.

Monthly performance reports are required for the CEC to accept a claim submission and complete settlement.

4. Option 4 Performance Reports

Within 10 business days after a program or test event occurs, Option 4 providers must submit participating device load or run-time data to the CEC in the specified format for all devices active in their aggregation.

5. Reports to the California Air Resources Board on Backup Generation

Within 10 business days after the end of each month in which a DSGS Program event occurred and the backup generator was dispatched, DSGS providers or participants participating in Participation Option 1 shall provide to the CEC and the California Air Resources Board (CARB) the following information regarding backup generation participants used during a DSGS Program event, if any:

- The address or GPS coordinates where such backup generation occurred
- Information on whether the backup generation is portable or stationary
- The engine size, age, rated horsepower, and federal emissions tier for each generator dispatched under the program
- The type and amount of fuel used by each generator dispatched under the program
- The hours of operation on each day with a program event of each generator dispatched under the program

The CEC will not approve requests for incentive payments for backup generation until CARB receives the report associated with that backup generation for each month in which the backup generation participated.

DSGS providers must determine with their participants who is responsible for submitting the reports. Participants enrolled directly with the CEC are responsible for submitting the reports.

CHAPTER 3:

Participation Option 1: Emergency Dispatch (Suspended)

Participation Option 1 is suspended for the 2026 program year due to budget constraints.

A. Participant Eligibility and Enrollment

Residential customers are not eligible to participate in Participation Option 1. Eligible participants must enroll to participate under Participation Option 1 by submitting to the DSGS provider, or the CEC if directly enrolling, all information listed in Chapter 2, Section D(1)(c). Additionally, the participant must verify in writing that:

- The participant meets the eligibility requirements of the DSGS Guidelines to the best of their knowledge.
- The participant will allow the CEC access to all documentation to verify compliance with the program.
- The information submitted is accurate and complete.
- The participant agrees to the terms and conditions of the program.

Participants may use behind-the-meter combustion or non-combustion resources. Combustion resources involve oxidizing fuel to produce energy. The fuel can be solid, liquid, or gas. Non-combustion resources eligible under Option 1 are those that can reduce electric load during emergency events without combustion.

Participants must also provide any other information the DSGS provider or CEC deems necessary.

B. Incentives

1. Energy Payment

Participants shall receive an energy payment at a rate of \$2 per kWh of verified incremental load reduction provided during an Option 1 event (that is, dispatch period) as outlined in Chapter 3, Section D.

The default process for calculating the verified incremental load reduction achieved during an Option 1 event is as follows:

- Step 1: Calculate the energy baseline (EB) at the service account level. The EB will be calculated on an hourly basis using the average of the preceding similar days.⁴ A service account must have at least 10 similar days of interval meter data available to have a valid baseline.
- Step 2: Calculate the day-of adjustment value (DOAV). A DOAV shall not be less than 0.60 or greater than 1.40. The DOAV is a ratio of (a) the average load of the first three hours of the four hours prior to the event to (b) the average load of the same hours from the days selected in accordance with Step 1 above. If either (a) or (b) are negative, the DOAV is 1.0.
- Step 3: Calculate the adjusted energy baseline (AEB). When the EB is greater than zero, a service account AEB for the event is calculated by multiplying the EB by the DOAV. If the EB is less than zero in an hour during the event, the AEB shall be equal to the EB (that is, DOAV treated as 1).
- Step 4: Calculate the incremental load reduction achieved during the event. The incremental load reduction for each hour of the event is the AEB minus the load measured during that hour. If this value is negative, the incremental load reduction in that hour shall be considered zero.

If the participant has a grid-connected device with export capability under the utility's interconnection agreement, the participant may choose to count exported energy, up to their export rating, in the incremental load reduction calculation. In that case, the baseline is modified to account for exported energy during non-event days and count exported energy in the incremental load reduction.

DSGS providers may propose an alternate method of calculating verified incremental load reduction in their application, subject to CEC approval, described in Chapter 2.C.1.

1. 2. Standby Payment

Participants using combustion resources that provide a standby commitment identifying their available combustion capacity shall be eligible for a standby payment of \$0.25 per kWh. Subsequent to a notice of a standby event described in Chapter 3, Section F, the participant shall receive the standby payment for each hour or portion thereof in which the combustion resource is not dispatched because:

- i) The balancing authority did not issue an energy emergency alert (EEA) at the level at which the participant's resource may dispatch under Chapter 3, Section D.
- ii) The Governor did not issue an emergency proclamation authorizing dispatch of backup generators.
- iii) Or both i and ii.

⁴ The 10 nonexcluded weekdays will be selected for weekday events; for weekend and holiday events, the 4 nonexcluded weekend and holiday days will be selected.

The standby payment will be based on the standby commitment. If the actual average load reduction during the dispatch period is less than the standby commitment, the standby payment shall be prorated to reflect the actual average load reduction demonstrated by the resource.

The standby commitment requirements are detailed in Chapter 3, Section F.

2. 3. Reimbursement for Increased Customer Demand Charges

Participants shall also be reimbursed for incremental increases in customer demand charges that result from participation in the program and are incurred during the billing period in which a DSGS Program event occurred, if any.

C. Program Events

To receive payment under Participation Option 1, participants shall dispatch enrolled resources to reduce electric load during Option 1 events called in response to EEAs issued by a California balancing authority during the following times:

- May 1 through October 31 each year (“program year”)
- Seven days a week

EEA levels include, in ascending order of potential for grid emergency or emergency severity:

- EEA Watch.
- EEA 1.
- EEA 2.
- EEA 3.

All participants will be notified of Option 1 events called in response to EEAs issued by either their host balancing authority or the California ISO. Additionally, participants with non-combustion resources will be eligible for Option 1 incentives when dispatching in response to EEAs issued by a neighboring California balancing authority if requested or notified by that balancing authority and authorized to respond by the participant’s host POU and balancing authority. If two or more California balancing authorities issue an EEA during the same time frame, participants shall prioritize providing load reduction to the balancing authority area in which the participant is located.

D. Dispatch Loading Order

In alignment with the state’s climate and air quality goals, to the maximum extent feasible, the DSGS provider, or participants, shall dispatch load reduction resources for Option 1 events in the following order:

1. Demand response resources, including batteries
2. Renewable and zero-emission resources
3. Near-zero-emission resources
4. Biomethane and natural gas resources
5. Conventional diesel and gas resources

DSGS providers, or the CEC for direct participants, will dispatch participants with backup generators only if authorized under a state of emergency proclamation issued by the Governor. Participation in the program does not waive any air or operation permit requirements.

Participation in the program cannot extend the useful life of a resource in contravention of the state's climate and air quality goals.

E. Dispatch Period

The dispatch period for an Option 1 event shall be determined by the EEA level at which the participating resource may dispatch to reduce electric load and the time frames identified in the EEA notices issued by the applicable balancing authority. Option 1 events always start at the beginning of a complete hourly interval. If the start time identified in the EEA notice is not hour-aligned, the associated event start time is rounded to the nearest hour, with times ending in 30 minutes rounded to the next hour. If the end time identified in the EEA notice is not hour-aligned, the associated event end time is always rounded to the following hour.

Participants may dispatch non-combustion resources during Option 1 events called in response to an EEA or EEA Watch. Participants may dispatch combustion resources in response to an EEA 2 or higher if authorized to dispatch by an executive order issued by the Governor, unless authorized to dispatch at a lower EEA level in an executive order issued by the Governor. The CEC shall notify DSGS providers and direct participants participating with combustion resources of any change in the EEA level at which combustion resources may be dispatched.

F. Standby and Dispatch Notification Process

When a California balancing authority issues an EEA Watch or an EEA 1, DSGS providers, or the CEC for direct participants, shall notify all participants with non-combustion resources to dispatch during the dispatch period as described in Chapter 3, Section E, and notify all participants with combustion resources of a standby event and to be ready to potentially dispatch if a dispatch event is issued. DSGS providers, or the CEC for direct participants, shall determine from the participants the amount of incremental load reduction that will be available from non-combustion resources and would be available from combustion resources during each hour of the EEA Watch or EEA 1 time frame (standby commitment). Participants are not required to provide a standby commitment. Participants that choose to provide a standby commitment must provide a commitment in response to each standby event. Standby commitments are specific to a single standby event and are not carried over to subsequent standby events.

DSGS providers and direct participants shall report to the CEC the amount of incremental load reduction committed to be available during the DSGS event time frame within one hour or as quickly as feasible after the balancing authority issues the EEA, but before the DSGS event hour to receive a standby payment for that hour. In the case of a sudden onset event, providers and direct participants shall report within one hour, recognizing that the event will have already started.

DSGS providers and direct participants shall provide to the CEC any updates to the standby commitments as soon as practicable.

DSGS providers, or the CEC for direct participants, shall notify participants to dispatch and reduce electric load during a dispatch period, as defined in Chapter 3, Section D.

CHAPTER 4:

Participation Option 2: Market-Integrated Demand Response Incremental Capacity Pilot

A. Demand Response Provider Eligibility

A DSGS provider, or its authorized third party, is considered a demand response (DR) provider when administering Participation Option 2. Third-party DR aggregators and POU's are eligible to serve as DR providers. DR providers must be operating within the California ISO balancing authority area and must have at least one proxy demand resource (PDR) registered to participate under the incremental market-integrated DR capacity pathway.

B. Participant Enrollment and Eligibility

Eligible participants must be enrolled in a PDR participating in the California ISO energy market and registered to an Option 2 provider. DR providers must collect and retain participant information, which may be reviewed by the CEC in an audit, as described in Chapter 8, Section D.

C. Performance-Based Compensation

Performance-based capacity payments will be made to DR providers based on a PDR's demonstrated capacity in excess of its resource adequacy (RA) capacity commitments, if applicable. For example, if a DR provider has a PDR portfolio RA capacity commitment of 10 MW and demonstrates capacity of 12 MW, the incremental demonstrated capacity is 2 MW. DR providers shall allocate the performance-based capacity payments between the DR provider and its PDR participants pursuant to the terms and conditions agreed upon by the DR provider and the participants. The performance-based capacity payment rates under Option 2 are summarized in Table 1.

Table 1: Capacity Prices by Month and Availability Requirement (\$/MW-month)

Month	Every Day	Non-Holiday
		Weekdays
May	\$9,000	\$7,200
June	\$9,300	\$7,440
July	\$16,800	\$13,440
August	\$18,000	\$14,400
September	\$19,200	\$15,360
October	\$10,500	\$8,400
Season Total (\$/MW)	\$82,800	\$66,240

Source: CEC staff

An additional 30 percent bonus shall be applied to the incremental capacity incentives for Program Years 2023, 2024, 2025, and 2026. Additional bonuses in future years may be provided at the CEC's discretion.

Incremental demonstrated capacity shall be calculated and performance-based capacity payments shall be disbursed following the season completion each program year.

In the 2026 program season, \$1 million is available for funding Option 2 performance-based capacity payments across all Option 2 participating providers. If additional funding becomes available through the 2026-27 budget process, up to \$3 million is available for Option 2. Available Option 2 funds shall be allocated to each participating provider based on the method described in Appendix A. Any funds remaining after the end-of-season allocations may be reallocated to the 2026 funding pool for Option 3.

D. Program Events

Incremental demonstrated capacity (defined in the following section) will be calculated based on resource availability and performance during a defined availability window. A PDR may participate on non-holiday weekdays only, or all days including weekends and holidays for a higher incentive level (Table 1). To receive payments for incremental capacity demonstrated under Option 2, the PDR must have capacity bid at a price no greater than \$600/MWh (or self-scheduled) in the day-ahead market for at least three consecutive hours between 4:00 p.m. and 10:00 p.m. For a PDR with a capacity obligation on a monthly RA showing, the RA availability and bidding rules take precedence over DSGS.⁵

Unlike the must-offer obligation under the RA program, DSGS does not require offering any minimum amount (MW). Instead, the DR provider may determine the appropriate amount to offer; this amount may factor into demonstrated capacity if dispatched. If the DR provider does not bid (or self-schedule) during these hours, a value of zero will be entered into the performance calculation described in the following section.

E. Measuring Performance

Under Option 2, incremental demonstrated capacity is calculated using the following method. The CEC shall allow DR providers to measure PDR capacity at the Resource ID level. The unit of analysis for these metrics is an "aggregation," which must consist of a single Resource ID.

1. Calculate Aggregation-Level Input Values

DSGS capacity measurement relies on the data streams listed below, each of which must be aggregated to the hourly level. These data streams and the aggregation required for each include the following:

⁵ Resource adequacy resources generally have a 24x7 must-offer obligation, unless otherwise specified by the California ISO tariff.

- **Offer:** The offer value is the real-time bid quantity at a price no greater than \$600/MWh plus self-schedules (MW) in the real-time market during each hour. The offer value for aggregation a (consisting of n Resource IDs r , where $n \geq 1$) in each interval (date d , hour h) is defined as:

$$Offer_{a,d,h} = \sum_{r=1}^n RTM_BID_QUANTITY_{r,d,h} + RTM_SELFCHEDMW_{r,d,h}$$

where RTM_BID_QUANTITY refers to the bid quantity at a price of $\leq \$600/\text{MWh}$. Offer values of zero will be excluded from analysis unless the sub-LAP DAM LMP $\geq \$600$, such that resources that have no schedules when the price cap is reached receive an offer value of zero.

- **Demand response energy measurement (DREM):** DREM is the delivered energy value (MWh) determined through California ISO settlement processes. The DREM value for aggregation a (consisting of n Resource IDs r , where $n \geq 1$) on day d in hour h over the twelve 5-minute intervals i is defined as:

$$DREM_{a,d,h} = \sum_{r=1}^n \sum_{i=1}^{12} DREM_{r,d,h,i}$$

- **Total expected energy (TEE):** TEE is the total amount of energy (MWh) a Resource ID is expected to deliver in the California ISO based on its real-time market schedules. The TEE value for aggregation a (consisting of n Resource IDs r , where $n \geq 1$) on date d in hour h over the twelve 5-minute intervals i is defined as:

$$TEE_{a,d,h} = \sum_{r=1}^n \sum_{i=1}^{12} EXP_ENRGY_QUANTITY_{r,d,h,i}$$

- **Temperature:** Temperature is defined on a daily basis based on the number of participating customers. This temperature metric is the average of daily high (TMax) and low (TMin) averaged across all dispatched customers on a given day. The daily high and low temperatures for a given customer will be taken from the closest weather station to the ZIP code of the customer with available data, such as those identified in the California ISO "NOAA Station to Zip Mapping" file.⁶ The temperature ("Temp") value for aggregation a (which may

⁶ California Independent System Operator. December 17, 2019. "[NOAA Station to Zip Matching,](http://www.caiso.com/Documents/NOAA-Station-to-Zip-Mapping.xlsx)" <http://www.caiso.com/Documents/NOAA-Station-to-Zip-Mapping.xlsx>.

consist of one or more Resource IDs within a single sub-LAP) on date d is defined as:

$$Temp_{a,d} = \frac{\sum_{c=1}^n \frac{1}{2} (TMax_{c,d} + TMin_{c,d})}{n}$$

where c is the index for customers dispatched on date d and n is the number of participating customers.

Equivalently, this value can be determined from counts of customers by ZIP code z :

$$Temp_{a,d} = \frac{\sum_{z=1}^m \frac{n_{z,d}}{2} (TMax_{z,d} + TMin_{z,d})}{\sum_{z=1}^m n_{z,d}}$$

where m is the number of ZIP codes and n is the number of dispatched customers in each ZIP code.

2. Individual Settled Load Impacts Are Calculated and Adjusted Relative to Bids

Hourly load impacts determined by California ISO settlement are adjusted relative to the amount offered, and dispatched according to the following definition of bid-normalized load impacts (BNLI) on date d and hour h :

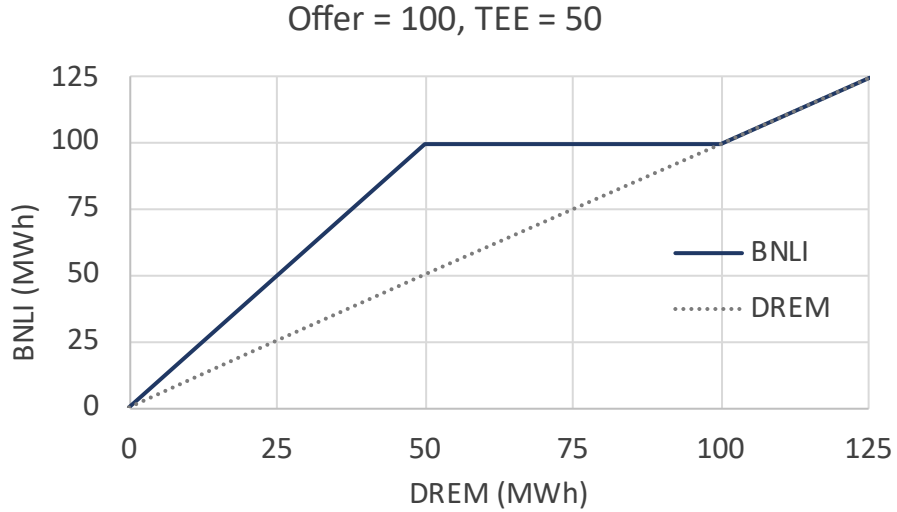
$$BNLI_{a,d,h} = Max \left(Offer_{a,d,h} \left(\frac{Min(DREM_{a,d,h}, TEE_{a,d,h})}{TEE_{a,d,h}} \right), DREM_{a,d,h} \right)$$

where $Offer$, $DREM$, and TEE are the hourly resource or aggregational values as defined above. BNLI will only be calculated if $Offer > 0$ or if the sub-LAP LMP $\geq \$600$, such that resources that have no schedules when the bid cap is reached receive a BNLI value of zero. If $TEE < 0.2 * Offer$ in an hour, the event shall also be omitted from the calculation of demonstrated capacity.

Intervals in which a DR resource does not bid in the day-ahead market as required by the RA program or DSGS will be assigned a bid-normalized load-impact value of zero. The hours the resource would have bid under an RA or DSGS obligation will be assumed to be the hours within the availability window with the highest consecutive day-ahead locational marginal price (LMPs).

Figure 1 illustrates bid-normalized load impacts as a function of actual DREM when the offer value is greater than TEE. When TEE is greater than or equal to offer, for example because the resource received a dispatch on bid amounts above \$600/MWh, BNLI will always be equal to DREM.

Figure 1: Example BNLI for Offer = 100 MWh and TEE = 50 MWh



Source: CEC staff analysis

3. Load Impact Temperature Models

DR providers may elect to apply a weather-sensitive or non-weather-sensitive demonstrated capacity calculation method for each aggregation in their portfolio. For weather-sensitive aggregations, a weighted least-squares linear regression models bid-normalized load impacts as a function of temperature. For non-weather-sensitive resources, capacity is defined as the mean LMP-weighted bid-normalized load impacts.

For weather-sensitive aggregations, the load impact regression model specification takes the following form:

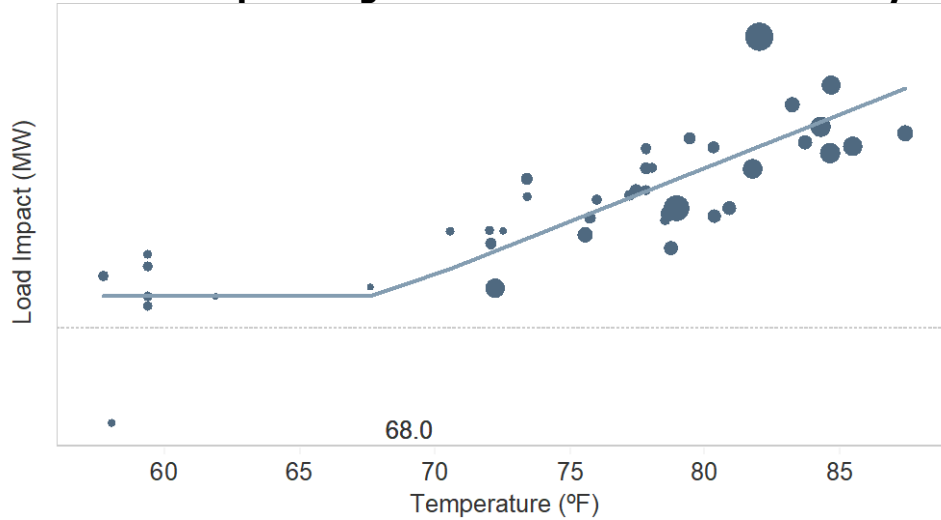
$$\text{BNLI} = a + b \cdot \max(\text{Temp}, C) + e$$

where BNLI is the estimated bid-normalized load impact value (MWh) in each hour, a is the model intercept value, b is a term reflecting sensitivity to hot weather, Temp is the average of daily high and low temperature (°F) for a representative sub-LAP weather station, C is a change point between regions under which the resource does and does not show weather sensitivity, and e is an error term. Change point C will be determined by testing values across the range of temperatures in the data in increments of 2°F and selecting the change point with the highest corresponding R² value.

The regression is weighted by day-ahead LMP for the sub-load aggregation point (sub-LAP). Temperature is the average of daily high and low for a representative weather station for each sub-LAP.

Figure 2 shows the load impact regression for a sample resource with a changepoint at 68°F, with LMP represented by point size.

Figure 2: Load Impact Regression With Weather Sensitivity



Source: CEC staff analysis

For non-weather-sensitive resources, the LMP-weighted mean bid-normalized load impact is calculated according to the following formula:

$$Capacity_a = \frac{\sum(BNLI_{a,d,h}LMP_{a,d,h})}{\sum(LMP_{a,d,h})}$$

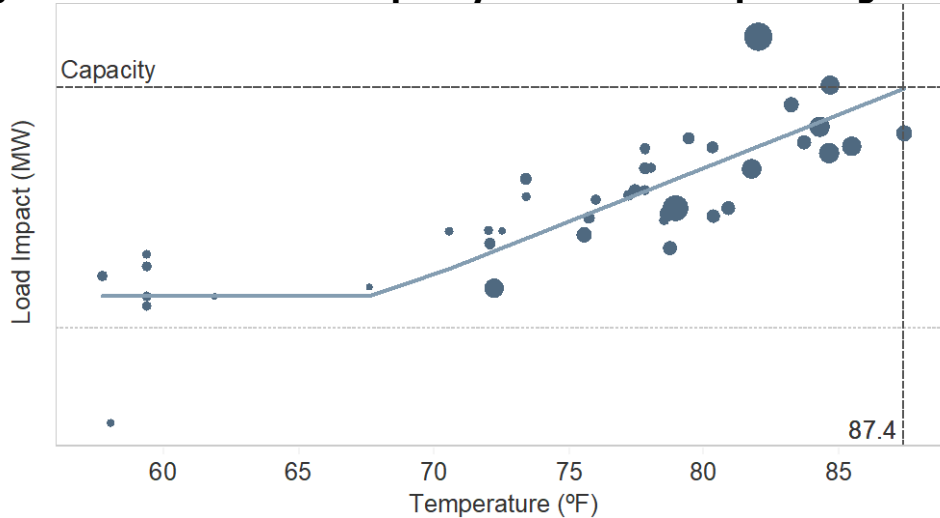
Where $BNLI_{a,d,h}$ is the bid-normalized load impact and $LMP_{a,d,h}$ is the sub-LAP day-ahead LMP for aggregation a on date d and hour h .

DR providers bear the responsibility to develop sufficient dispatches to calculate a demonstrated capacity value through the regression model or weighted average. Each DR aggregation must receive at least one dispatch resulting in a non-zero BNLI value per month from July through September and one non-zero BNLI value per month on average to be awarded a demonstrated capacity value for the season. In the case of a single dispatch for participation in a single month, the non-weather-sensitive capacity formula shall be applied. Regardless of participation duration, each aggregation must receive at least one dispatch resulting in three consecutive non-zero BNLI values.

4. Determine Demonstrated Capacity From Load-Impact Models

For weather-sensitive resources, the seasonal demonstrated capacity is defined as the value of the regression model at the maximum temperature (as previously defined) for which the resource had a dispatch event during the program year. Figure 3 illustrates the demonstrated capacity derived from the highest dispatch event temperature of 87.4°F.

Figure 3: Demonstrated Capacity Value From Impact Regression



Source: CEC staff analysis

For non-weather-sensitive resources, demonstrated capacity is calculated directly in the previous step.

5. Calculate Incremental Demonstrated Capacity Relative to Resource Adequacy Obligation

Sum a DR provider's capacity obligations included in month-ahead RA showings across all California ISO LSEs by month. The month with the highest total RA capacity showing is considered the reference RA obligation. Sum all resource-level demonstrated capacity values from above and subtract the reference RA obligation. Any positive difference is the incremental demonstrated capacity.

Payment to each DR provider shall be made for this incremental capacity for all program months the provider participated in at the rates enumerated in Table 1.

F. Data Requirements

By participating in Option 2, DR providers authorize the California ISO to transmit resource-level data required to calculate demonstrated capacity to the CEC. These data streams include:

- **Real-time market bids and self-schedules** (in MWh) by Resource ID.
- **Total expected energy** (TEE, in MWh) by Resource ID.
- **Demand response energy measurement** (DREM, in MWh) by Resource ID.

CHAPTER 5:

Participation Option 3: Market-Aware Storage Virtual Power Plant Pilot

A. Aggregator and Participant Eligibility

A DSGS provider, or its authorized third party, is considered a storage virtual power plant (VPP) aggregator when administering Participation Option 3. Third-party battery providers, including third-party vehicle-to-load or grid (V2X) service providers, POUs, and CCAs, are eligible to serve as storage VPP aggregators. POUs and CCAs may serve only customers for which they serve as the LSE or retail provider.

A VPP shall consist of behind-the-meter (BTM) battery storage, which may include stand-alone batteries and batteries paired with solar systems or battery-electric vehicles (EVs) with bidirectional charging capability. A VPP may include residential (bundled or unbundled) or nonresidential (bundled or unbundled) customers.

To be eligible to serve as a storage VPP aggregator of Participation Option 3, the storage VPP aggregator must:

1. Receive authorization from participants allowing for the use of their device for DSGS Program participation.
2. Send dispatch signals to or directly control individual batteries.
3. Collect and provide hourly or sub-hourly charge/discharge interval data from a battery inverter or submeter to the CEC.
4. Comply with the participants' utility interconnection agreements (for example, a Rule 21 tariff). Dispatch in violation of an interconnection agreement is not eligible for performance-based capacity payments.
5. Aggregate a total minimum nameplate power rating of 300 kW per aggregation for stationary storage assets and a total minimum nameplate power rating of 50 kW per aggregation for EVSEs. For stationary storage assets, the total nameplate power rating is determined by summing the nameplate continuous power rating (kW) from the specification sheets of the individual storage devices comprising the aggregation. For aggregations of EVs, the total nameplate power rating is determined by summing the discharge power rating (kW) from the specification sheets of the EVSE used by individual vehicle operators.

At a minimum, each customer site participating in a market-aware storage VPP must:

1. Have an operational stationary battery system or an EV with bidirectional EVSE capable of discharging at least 1 kW for at least two hours during a program event.

2. Provide no more than 2,000 kW discharge during any hour of a program event.⁷
3. Have permission from the host utility to operate the stationary battery storage system or bidirectional EVSE in parallel to the utility's grid (for example, under a Rule 21 tariff) and operate in a manner compliant with existing rules and tariffs applicable to the site. UL 1741-SB listing of bidirectional EVSE is not required for participation in a DSGS VPP.
4. Not be participating in a California ISO proxy demand resource (PDR) or reliability demand response resource (RDRR) unless either:
 - a. The participant's customer energy baseline reflects total gross consumption (that is, consumption independent of any energy produced or consumed by behind-the-meter battery storage) consistent with California ISO tariff Section 4.13.4, or
 - b. The participant is enrolled in DSGS with a stationary export-only resource, as described in Section E.

If a participant is identified as participating in a conflicting program, the participant's DSGS provider will be notified, and the participant shall be suspended from participation indefinitely until the conflict is resolved.

A DSGS provider serving as a storage VPP aggregator for more than one partner company may consider each partner company's battery aggregation to be separate and distinct VPPs that will be measured and compensated independently. In this case, the storage VPP aggregator must submit separate entries for each partner's aggregation and identify the partner for each participating site in the enrolled participation report. Each partner must be able to meet all other aggregator requirements, such as the minimum aggregate nameplate power.

At a minimum, to participate under Option 3 as a storage VPP, each aggregation must:

- Consist of customer sites of the same customer class, located within the same UDC service territory and, if applicable, associated with the same partner company.
- Consist of storage assets of the same device type (stationary storage or EVSE).
- Consist of storage assets nominated for the same duration (number of hours, see following section for details).

B. Participant Enrollment

Storage VPP aggregators must collect and maintain the following information to enroll eligible participants under Participation Option 3:

- Legal name of the participant or name on the utility bill at the participating site
- If contact name is different from above, primary contact's name and, if available, title

⁷ A customer site may participate with a stationary battery system capable of discharging greater than or equal to 2,000 kW but only incremental discharge up to 2,000 kW during a given event hour shall be counted toward performance.

- Email address and phone number of participant or primary contact
- Valid service account address, valid service account or agreement identification number (SAID), or both
- Service account UDC
- Indication of whether the service account is non-residential or residential.
- Indication of whether the participating resource type is stationary default, stationary export-only, stationary VNEM, or bi-directional EVSE
- Authorization from the participant allowing for the use of their device charge and discharge data for purposes of program participation
- Acknowledgement and agreement from the participant that:
 - The participant meets the eligibility requirements of the DSGS Guidelines and is not enrolled or participating in a conflicting program to the best of their knowledge.
 - The participant will allow the CEC access to all documentation to verify compliance with the program and program performance.
 - The information submitted is accurate and complete.
 - The participant agrees to the terms and conditions of the program.
- Any other information the storage VPP aggregator deems necessary

Participant enrollment information may be reviewed by the CEC in an audit as described in Chapter 8, Section D.

C. Performance-Based Compensation

Performance-based capacity payments shall be made to storage VPP aggregators based on the demonstrated capacity of a VPP during market-aware VPP events as calculated in Section E, below. Storage VPP aggregators shall allocate the payments between the storage VPP aggregator and their customer participants pursuant to the terms and conditions agreed to between the storage VPP aggregator and participant.

Different levels of capacity prices for demonstrated capacity (kW) are available for VPPs of varying durations (hours). Storage VPP aggregators shall be eligible for a payment for demonstrated capacity of a VPP at the rates defined in Table 2 based on the capacity (kW) and discharge duration (hours) demonstrated by the storage VPP aggregation in each month.

Table 2: Storage VPP Capacity Prices (\$/kW-month)

Month	4-Hour	3-Hour	2-Hour
May	\$9.00	\$8.10	\$6.75
June	\$9.30	\$8.37	\$6.98
July	\$16.80	\$15.12	\$12.60
August	\$18.00	\$16.20	\$13.50
September	\$19.20	\$17.28	\$14.40
October	\$10.50	\$9.45	\$7.88
Annual Total (\$/kW)	\$82.80	\$74.52	\$62.10

Source: CEC staff analysis

An additional 30 percent bonus shall be applied to all capacity prices for Program Years 2025 and 2026. Additional bonuses in future years may be provided at the CEC’s discretion.

In the 2026 program season, \$19.5 million is available to fund Option 3 performance-based capacity payments. If additional funding becomes available through the 2026-2027 budget process, up to \$42.7 million is available for Option 3. Funds will be allocated to each aggregator based on the method described in the Option 3 Compensation Allocation Method in Appendix A. Except for VPP aggregators of bi-directional EVSEs, participation in the 2026 program season is limited to storage VPP aggregators that participated in October 2025.

D. Program Events

Option 3 program events may occur only during the following times:

- **Daily availability:** Starting no earlier than 4:00 p.m. and ending no later than 9:00 p.m.
- **Weekly availability:** Seven days a week.
- **Maximum events:** 60 day-ahead event hours per program year (May–October), plus monthly test events as applicable in the absence of suitable full-duration events. Participation in more than 60 day-ahead event hours is optional but may be used to increase demonstrated capacity. If the day-ahead events called in a month bring the total for a given aggregation to more than 60 event hours for that program year, the event hours in the month with the highest performance shall be included in the 60 event hour maximum and used to determine the aggregation’s demonstrated capacity in that month.
- **Minimum events:** One full duration event per month is required for all participating aggregations. Storage VPP aggregations that have reached the maximum event hours per season must still participate in at least one full-duration event in each month. In the absence of a full-duration DSGS Program non-test event, a full duration test event must be enabled by the storage VPP aggregator (see Test Events below). This requirement supersedes the maximum event hours threshold.

- **Exceptions:** Event hours may be discarded from the performance calculation at the discretion of the storage VPP aggregator if customers representing 10 percent or more of the nameplate power rating of the aggregation lose power on an event day before or during the event.
- **Day-Ahead Events:** A day-ahead storage VPP event is triggered within the hours that meet either of two criteria within program hours. These criteria are:
 - A. Absolute Price Trigger:** The hourly locational marginal price (LMP) must be greater than or equal to \$200/MWh.
Option 3 VPP events will only be called for consecutive hours. If multiple hours within the program window meet the Absolute Price Trigger but are not consecutive, the hour, or hours, in between shall also be considered to meet this criterion.
 - B. Day-Ahead Emergency Trigger:** If an EEA Watch or above is called for the following day by the host BA, the emergency trigger shall take effect beginning at 4:00 p.m. and lasting until 9:00 p.m.

If no hours within the program window meet either criterion, no day-ahead event shall be called.

For all aggregations, hourly price is defined as the California ISO day-ahead hourly LMP for the default load aggregation point (DLAP) of the aggregations' host UDC, or the trading hub of the host UDC if a DLAP is not available.⁸

A program event may last from one hour to the maximum discharge duration of a VPP aggregation. If the number of hours meeting the Absolute Price Trigger exceeds the nominated capacity duration, only those consecutive hours with the highest mean hourly price shall be considered event hours. If the highest mean consecutive hourly price applies to more than one set of hours (that is, if there is a tie), the event will be the first (that is, earliest) set of hours meeting these conditions.

For example, if an event is price triggered, the performance of a 3-hour VPP aggregation will be measured over the three highest-priced consecutive hours that meet the Absolute Price Trigger during the 4:00 p.m.–9:00 p.m. program window. If more than three hours meet or exceed the Absolute Price Trigger during this window on a given day, only the three highest-priced consecutive hours will count toward performance. If fewer than three hours meet the Absolute Price Trigger, only those hours will count toward performance.

- **Test Events:** In the absence of a full-duration, day-ahead storage VPP event during a participation month, a storage VPP aggregator must define a full-duration test event per aggregation to substantiate its demonstrated capacity value. The test hours must occur during hours with the highest consecutive hourly prices within the program

⁸ The UDCs and corresponding aggregate pricing node IDs are Pacific Gas and Electric ("DLAP_PGAE-APND"), Southern California Edison ("DLAP_SCE-APND"), San Diego Gas & Electric ("DLAP_SDGE-APND"), and the POUs of Anaheim, Azusa, Banning, Pasadena, Riverside, and Vernon (SP15, "TH_SP15_GEN-APND").

hours and last for the duration of the capacity commitment. VPP aggregators must notify the CEC of planned test events no later than 3:00 p.m. on the day preceding the planned test event. The storage VPP aggregator must provide the CEC with the hours of the planned test event, the UDC service territory, and nominated duration of the storage VPP(s) that will participate in the test event.

To help mitigate potential system impacts associated with dispatches of large aggregations, the CEC, in consultation with the California ISO, will work with storage VPP aggregators with large aggregations to explore, develop, and implement technical solutions and may additionally require these aggregators to conduct test events for the PG&E UDC service territory and the Southern California UDC service territories (SCE and SDG&E) on different days.

Test events may coincide with a shorter duration price-triggered storage VPP event. If all storage VPP events called during a month are shorter than the discharge duration of a VPP aggregation, a provider may extend an event with test hours to reach the aggregation's full discharge duration. In this case, both day-ahead event hours and test hours will be used in the capacity calculation.

Except in August, a storage VPP aggregator may conduct multiple test events in a month per aggregation, but only the most recent test event will be used in the calculation of demonstrated capacity for that month.

In August, in the absence of three consecutive full duration day-ahead events, the storage VPP aggregator must call a full-duration three-day test – that is, conduct a full-duration test event on three consecutive days, subject to other requirements described above. The storage VPP aggregator must notify the CEC of the planned three-day testing no later than 3:00 p.m. on the day preceding the first day of the three-day test. The three-day test cannot be repeated. Performance results of all test events, along with any day-ahead events, will be counted in August's demonstrated capacity calculation.

- **Day-of Events:** If an EEA Watch or above is issued for the same day by the host BA, the emergency trigger shall take effect at the later of the notice issued time rounded to the nearest hour, the notice start time rounded to the nearest hour, and 4:00 p.m., and last no later than 9:00 p.m. Day-of event triggers shall not change day-ahead event hours. If a day-of Event is called following a partial-duration day-ahead event, the day-of event hours must be consecutive with the day-ahead event hours. Subject to this constraint, only the consecutive hours of the discharge duration with the highest mean LMP shall be considered event hours, with ties in LMP going to the earlier set of hours. Following the issuance of the first (earliest) day-of EEA Watch or above, the issuance of any subsequent day-of EEAs on the same day shall not supersede or change the day-of event hours.

Day-of event hours shall not be included in the demonstrated capacity calculation described in Section E.4 below and the VPPs dispatching during the event will be compensated at a rate of \$1 per kWh of net discharge. Day-ahead event hours, including test event hours, are not considered day-of event hours.

E. Measuring Performance

1. Hourly Discharge

Except as provided below, hourly discharge shall be measured at the submeter or inverter associated with the participating battery or EVSE, regardless of whether the energy serves BTM load or is exported to the grid.

Hourly Discharge for an aggregation a is the total discharge across all resources r in the aggregation, during hour h of day d :

$$Discharge_{a,d,h} = \text{sum}(Discharge_{r,d,h})$$

Any charging of the battery system is considered the negative of discharge in the calculation.

If the participant is also enrolled in a supply-side DR program and participating in DSGS with a stationary export-only resource, then only the discharge exported to the distribution grid shall be attributable to the DSGS program using the following formula:

$$Discharge_{r,h} = |\min(load_{r,h}, 0)|$$

Where $load_{r,h}$ is the hourly load (kWh) from the electric utility meter at the customer site with the resource r in hour h . That is, for DR-enrolled customers, discharge is the absolute value of any negative load during a DSGS event hour.

2. Net Discharge

For Option 3 events, hourly Net Discharge (*NetDischarge*) of an aggregation in each event hour shall be determined by subtracting the aggregation's hourly Discharge (*Discharge*) from the applicable hourly Measured Baseline (*MBaseline*) as defined in Section E.3 below:

$$NetDischarge_{a,h} = Discharge_{a,h} - MBaseline_{a,h}$$

The formula for *NetDischarge* is the same for both day-ahead and day-of events.

3. Measured Baseline

The Measured Baseline (*MBaseline*) will be established per a 10-in-10 (weekday) or 5-in-5 (weekend/holiday) day-matching non-event-day baseline.

The process for calculating the Measured Baseline for aggregation a in hour h is as follows:

- Step 1: For event e of aggregation a , identify the m preceding eligible baseline days, where m is 10 for a weekday, non-holiday event and 5 for a weekend/holiday event. A day is eligible for baseline selection if all the following conditions are met:

- It is a similar day type to the event day (either weekday non-holiday or weekend/holiday)
- There was no Option 3 event of any kind for that aggregation on the day
- A power loss was not experienced by customers representing 10 percent or more of the nameplate power rating of the aggregation during the hours of 4 p.m. – 9 p.m. on that day
- The day is no more than 30 calendar days before the event date
- Step 2: For each event hour h of event e , calculate the average hourly *Discharge* across the m selected baseline days d for aggregation a to determine the hourly *MBaseline*:

$$MBaseline_{a,e,h} = \text{sum}(Discharge_{a,d,h})/m$$

Additional notes related to baseline determination:

1. There is no day-of adjustment applied to the baseline.
2. Submeter data is required for all participating resources for the months of their participation and the month immediately preceding each month of participation, unless already submitted.
3. CEC staff may audit the integrity of an aggregation’s baseline by comparing the *MBaseline* computed in Step 2 above for an event in a given month with an alternative *MBaseline* computed for other similar m days in the month. After accounting for potential baseline change due to rate changes, weather dynamics, and typical customer usage variations, and providing a timely opportunity to the aggregator to explain any additional observed deviation, if the alternative *MBaseline* exceeds the Step 2 *MBaseline* by 10% or more beyond the deviation accounted for by the foregoing factors (and the explanation for this observed additional deviation is found to be unsatisfactory), the compensation for the aggregation will be reduced by 25% in that month.
4. For bi-directional EVSE resources, the Measured Baseline is defined as zero kWh per hour.

4. Demonstrated Capacity

Demonstrated capacity for an aggregation a in a participation month m ($DCapacity_{a,m}$) shall be defined as the weighted average of hourly Net Discharge across all event hours in the month, where the weights are given by the relevant hourly price (LMP) across all day-ahead storage VPP event hours (including test event hours, where applicable), as summarized below:

$$DCapacity_{a,m} = \text{sum}(NetDischarge_{a,m,h} * LMP_h) / \text{sum}(LMP_h)$$

Where LMP_h is the day-ahead LMP in hour h .

Any aggregation that shows a demonstrated capacity at or below zero in a month will not be eligible for compensation for that month.

F. Potential Market Integration

California ISO staff released on March 13, 2026, a straw proposal that incorporates a pathway for exports by BTM distributed energy resources (such as the Option 3 storage VPP) to be monetized in energy markets. To help provide operational experience and data for consideration by other agencies in assessing whether or how BTM storage resources could be incorporated in their reliability planning and operational frameworks, the CEC staff may explore, develop, and implement, in consultation and collaboration with the California ISO and select interested aggregators, a process or mechanism to facilitate the integration of some Option 3 VPP resources (offered by interested aggregators) into the California ISO energy markets and enable market-based dispatches by the California ISO and energy settlement between the California ISO and the aggregators in the 2026 season, while the VPP resources continue receiving performance-based capacity payments subject to meeting DSGS Program requirements.

CHAPTER 6:

Participation Option 4: Emergency Load Flexibility Virtual Power Plant Pilot

A. Aggregator and Participant Eligibility

A DSGS provider, or its authorized third party, is considered a load flexibility virtual power plant (VPP) aggregator when administering Participation Option 4. Third-party load flexibility providers, POUs, and CCAs are eligible to serve as load flexibility VPP aggregators. POUs and CCAs may serve only customers for which they serve as the LSE or retail provider.

A load flexibility VPP shall consist of eligible dispatchable equipment types listed below:

- Weather-sensitive resources:
 - smart thermostats with runtime monitoring capability controlling air conditioning units, including heat pumps, without load monitoring capability, or
 - smart thermostat with load monitoring capability controlling air conditioning units, including heat pumps.
- Non-weather-sensitive resources:
 - heat pump water heaters,
 - electric resistance water heaters,
 - electric vehicle supply equipment (EVSE),⁹
 - stationary BTM batteries, or
 - residential smart electrical panels (also known as circuit breaker box or service panel).

VPP aggregators may submit proposals to the CEC for approval to qualify other load flexibility dispatchable resources as eligible for participation in Option 4. Proposals must be submitted at least 14 business days before the start of the participating quarter. Proposals must include a description of:

1. The resource,
2. How the resource will be dispatched to provide load reduction incremental to resource adequacy during a program event,
3. How the device load will be monitored,

⁹ EVSE participating in Option 4 do not need to be bi-directional.

4. How the committed capacity nominations will be determined, and
5. Barriers impeding the proposed aggregation from participating in other existing programs (such as time-of-use and resource adequacy qualified demand response) for encouraging load reduction.

A load flexibility VPP may include dispatchable devices located at residential (bundled or unbundled), nonresidential (bundled or unbundled) customer sites, or both.

To be eligible to serve as a load flexibility VPP aggregator of Participation Option 4, the load flexibility VPP aggregator must:

1. Receive authorization from participants allowing for the use of their device for program participation.
2. Send dispatch signals to or directly control individual devices participating in the load flexibility VPP.
3. Collect and provide 15-minute or 5-minute load data from a smart thermostat-controlled HVAC system, or other eligible device, to the CEC. If HVAC load data is unavailable, then the HVAC runtime data from a smart thermostat can be provided as an alternative.
4. Aggregate a minimum 100 kW of load reduction per aggregation (50 kW for EVSEs):

At a minimum, each participating site in a load flexibility VPP must:

- Have an operational eligible equipment device capable of reducing net load in response to a dispatch signal by the VPP aggregator by changing device operational mode, temperature setpoint, or other method. Device operational changes through behavioral actions are not eligible.
- Not be participating in a California ISO PDR or RDRR or registered in the California ISO Demand Response Registration System (DRRS).
- Not be a distribution service customer of Pacific Gas and Electric Company (PG&E).

If a participant is identified as participating in a conflicting program, the participant's DSGS provider will be notified, and the participant shall be suspended from participation indefinitely until the conflict is resolved.

Each load flexibility aggregation must consist of a single device technology type and customer sites located within the same UDC service territory.

B. Participant Enrollment

Load flexibility VPP aggregators must collect and maintain the following information to enroll eligible participants and their devices under Participation Option 4:

- Name of the participant
- Address at which the device is installed
- UDC for the above address

- Eligible equipment type for the device
- Authorization from the participant allowing for the use of their device load or runtime data for purposes of program participation
- Acknowledgement and agreement from the participant that the information submitted is accurate and complete.
- Any other information the load flexibility VPP aggregator deems necessary

Participant enrollment information may be reviewed by the CEC in an audit as in Chapter 8, Section D.

C. Performance-Based Compensation

Load flexibility performance-based monthly capacity payments will be made to load flexibility VPP aggregators based on the performance of each aggregation relative to its monthly committed capacity nomination (see Committed Capacity Nomination below). The monthly capacity prices applicable to the payments for the monthly demonstrated capacity (performance) achieved by load flexibility aggregations are summarized in Table 3.

Table 3: Load Flexibility VPP Capacity Prices

Month	\$/kW-month
May	\$5.86
June	\$7.10
July	\$9.79
August	\$13.42
September	\$15.41
October	\$9.00
Season Total	\$60.58 / kW-yr

Source: CEC staff

Load flexibility VPP aggregators shall allocate the performance payments between the aggregator and its participants pursuant to the terms and conditions agreed to between the aggregator and participant.

The final monthly performance payment of the season shall be adjusted relative to the total compensation associated with the committed capacity nomination based on VPP performance during program events (see Section E.3).

D. Committed Capacity Nomination

Monthly committed capacity nominations are composed of two parts: (1) per-device average load reduction commitment and (2) device enrollment. Per device load reduction commitments are submitted for each program season, and device enrollments are submitted and updated monthly.

No later than five business days before the first month of program participation in a UDC, each load flexibility VPP aggregator shall submit per-device average load reduction commitment nomination for each month. For a weather-sensitive aggregation, this nomination estimate shall reflect the weather-normalized load reduction capacity, or per device average load reduction capacity, at the planning temperature *TPlan* for the applicable UDC service territory, as defined in Section F.2 (Performance Evaluation).

No later than five business days ahead of the first day of each participation month, a load flexibility VPP aggregator shall submit the number of devices enrolled for each aggregation. The total committed capacity nomination for that month is the product of the nominated per-device average load reduction commitment and monthly device enrollment. The nominated committed capacity compensation is the product of the total committed capacity nomination and the applicable capacity price for that month. The CEC shall set aside funds for each load flexibility VPP aggregator in an amount equal to 120 percent of the nominated committed capacity compensation.

Due to budget constraints, Option 4 total committed capacity is limited to 75 MW (MaxCC) of committed capacity each month across all participating aggregators for the 2026 program season (up to \$5,452,200 total for the program season). If additional funding becomes available through the 2026-2027 budget process, the Option 4 MaxCC of committed capacity each month in the second quarter of the season will increase to 100 MW (up to \$7,269,600 total for the program season).

- In case the total committed capacity nominated by providers in a month exceeds MaxCC, the CEC will allocate the MaxCC of committed capacity to the participating aggregators as described in Appendix A. In this case, the aggregators will be provided an opportunity to adjust the device enrollment level, at their discretion, in line with their allocated capacity and re-submit the enrollment data prior to the start of the month.
- If the total committed capacity nominated by aggregators is less than the MaxCC in any month in the first program quarter, then the funds associated with the unutilized capacity in first quarter will be added to the funding pool available for the second program quarter. With those funds, the MaxCC for each month of the second program quarter will be increased, such that the projected compensation at 120% performance over the program season is consistent with the funding limit set for Option 4.
- Any funds remaining after the end of season compensation payout may be reallocated to the 2026 funding pool for Option 3.

E. Program Events

Option 4 load flexibility VPP events may occur only during the following times:

- **Daily availability:** Starting no earlier than 4:00 p.m. and ending no later than 10:00 p.m.
- **Weekly availability:** Seven days a week.
- **Maximum events:** Option 4 events are capped at cumulative 60 hours per program season (May–October). Participation in events beyond 60 hours is optional but may be used to increase demonstrated capacity. If the events called in a month bring the total

for a given aggregation to more than 60 hours for the program year, the event hours with the highest performance shall be included in the 60-hour maximum and used to determine the aggregation's demonstrated capacity for that month.

Option 4 events are capped at 3 events in any 7-day period. If an event occurs in excess of this limit, the event will be excluded from calculation of the Performance-Adjusted Capacity Payment in Section F.3, but providers shall be eligible for energy payments for that event at the rate of \$1/kWh of load reduction during core hours and \$0.50/kWh during shoulder hours (see "Event Trigger" below).

- **Minimum events:** One event per program quarter is required for participating load flexibility VPPs (aggregations), where the months of May through July constitute the first program quarter and the months of August through October constitute the second program quarter. A load flexibility aggregator must begin initial participation by May 1 to participate in the first program quarter and by August 1 to participate in the second program quarter.
- **Event trigger:** A load flexibility VPP event shall occur on each day for which the host BA issues an EEA or EEA Watch ("EEA Watch+" or "emergency trigger"), subject to the maximum event limit (above).
- **Test events:** In the absence of a load flexibility VPP emergency-triggered event in each of the 3-month program quarters defined above, the VPP must respond to a CEC-initiated test event per quarter to meet the minimum event requirement. The test hours shall be consistent with the event hour selection criteria defined below. The CEC shall make reasonable efforts to align test events with high-need days in coordination with the California ISO and to avoid test events if an emergency-triggered event is likely. However, it is possible that an emergency-triggered event may occur later in a month in which a CEC-initiated test event has already occurred. In this case, the VPP's performance in both events will be counted in determining the VPP's performance in that month.
- **Event hour selection:** Load flexibility VPP events shall consist of up to two hours of "core" event hours and up to two hours of "shoulder" event hours, in 15-minute increments.

In general, the core intervals target the "peak price hours," defined as the two consecutive hours in the daily availability window with the highest mean hourly price. For all aggregations, hourly price refers to the California ISO day-ahead energy market hourly LMP for the default load aggregation point (DLAP) of the host UDC, or the trading hub of the host UDC if a DLAP is not available.¹⁰ If the highest mean hourly price applies to more than one set of consecutive hours (that is, if there is a tie), the core hours shall begin with the earliest set of consecutive hours with the highest mean hourly price.

¹⁰ The UDCs and corresponding aggregate pricing node IDs are Pacific Gas and Electric ("DLAP_PGAE-APND"), Southern California Edison ("DLAP_SCE-APND"), San Diego Gas & Electric ("DLAP_SDGE-APND"), and the POU's of Anaheim, Azusa, Banning, Pasadena, Riverside, and Vernon (SP15, "TH_SP15_GEN-APND").

The shoulder intervals target the hour immediately preceding and hour following the core hours.

Both core hours and shoulder hours may be shifted or shortened in 15-minute increments to conform to the daily availability window and minimum response time (above). The subsections below detail how core and shoulder hours may be adjusted depending on the notice issued time relative to the start of the peak price hours.

- **Advanced-Notice Events:** An Advanced-Notice Event is triggered by an EEA Watch+ notice issued at least 1 hour and 20 minutes ahead of the peak price hours start time. In Advanced-Notice Events, both core and shoulder intervals are hour-aligned. The core intervals are the peak price hours and the shoulder intervals are the hours immediately preceding and following the peak price hours, unless outside the availability window.
- **Short-Notice Events:** A Short-Notice Event is triggered by an EEA Watch+ notice issued more than 20 minutes but less than 1 hour and 20 minutes ahead of the peak price hours start time. Short-Notice Event core intervals are hour-aligned. The shoulder intervals are the 15-minute intervals preceding the peak price hours start time and at least 20 minutes from the EEA Watch+ notice issued time, and four intervals immediately following the event, unless outside the availability window.
- **Real-Time Events:** A Real-Time Event is triggered by an EEA Watch+ notice issued less than 20 minutes before the peak price hours start time, including notices issued during or after the peak price hours. Only during Real-Time Events may core intervals be not hour-aligned. Real-Time Event core intervals shall take effect beginning the first 15-minute interval at least 20 minutes from the EEA Watch+ notice issued time. The core intervals shall last for two hours or until 10:00 p.m., whichever is earlier. The shoulder intervals are the four 15-minute intervals immediately following the event, unless outside the availability window. If no EEA Watch+ is issued by 8:40 p.m., no emergency-triggered event shall be called.
- **Event Cancellation:** A load flexibility VPP event shall be cancelled if the host BA issues a cancellation of all applicable EEA Watch+ notices at least 20 minutes before the beginning of the first scheduled shoulder interval. (Real-time events are always initiated within 80 minutes of the highest LMP hours and start with core intervals. These events cannot be cancelled.)

F. Measuring Performance

Option 4 load flexibility VPP devices (or resources) will be aggregated to the UDC territory for IOUs, trading hub for California ISO-integrated POUs, or BA area for non-California ISO POUs, collectively referred to as "territory."

1. Incremental Load Reduction Measurement

a. Non-Weather-Sensitive Resources

Load impacts, or incremental load reduction, of non-weather-sensitive resources shall be measured relative to a 10-in-10 or 4-in-4 day-matching non-event-day

energy baseline consisting of the average load during a 15-minute measurement interval in the 10 preceding non-holiday weekdays or 4 preceding weekend/holiday days matching the event day type.

Load for aggregation a is the total load across all devices r during the 15-minute interval i of day d :

$$Load_{a,d,i} = \text{sum}(Load_{r,d,i})$$

The energy baseline (*Baseline*) for aggregation a during the measurement interval i of event day e is the average aggregate load (*Load*) in that interval across the n (10 or 4) similar non-event days d :¹¹

$$Baseline_{a,e,i} = \text{sum}(Load_{a,d,i}) / n$$

Incremental load reduction (*ILR*) for aggregation a during event interval i of event day e is defined as the aggregation's baseline load value minus the aggregation's observed load for that event interval:

$$ILR_{a,e,i} = Baseline_{a,e,i} - Load_{a,e,i}$$

A negative load impact (*ILR*) result implies that the aggregation's load increased during the event interval relative to the aggregation's baseline load level.

b. Weather-Sensitive Resources

Incremental Load Reduction

Load impacts, or incremental load reduction, of weather-sensitive resources shall be calculated using a 4-day weather-matching baseline with a 28-day lookback period and day-of adjustment applied. The baseline shall be applied to the resource's load if available, or compressor runtime if not. Runtime-based estimates of compressor load shall use an assumed connected load of 2.5 kW for full or high speed and 1.25 kW for partial or low speed compressor. For example, on a multi-stage AC compressor, full or high speed would be the mode controlled by the Y2 wire and partial or low would be controlled by Y1. A single-stage compressor would be controlled only by any of Y, Y1, or Y2.

The process for calculating the aggregation's estimated incremental load reduction is as follows:

- Step 0: If the load of the device is directly measured and recorded, skip this step. Otherwise, calculate the device's estimated load during a measurement interval using the assumptions described above. For example, if in a 15-minute measurement interval the compressor runs for 6 minutes on high and 3 minutes on low, the estimated load during the interval is $2.5\text{kW} \cdot 0.1\text{h} + 1.25\text{kW} \cdot 0.05\text{h} = 0.25\text{kWh} + 0.0625\text{kWh} = 0.3125\text{ kWh}$. The aggregation's

¹¹ The 10 non-excluded weekdays will be selected for weekday events; for weekend and holiday events, the 4 non-excluded weekend and holiday days will be selected.

estimated load in that interval is the sum of the estimated load in that interval of all devices in the aggregation.

- Step 1: Calculate the energy baseline (EB) and the event day aggregate load of an aggregation. Identify the four similar¹², non-event days (from the preceding 28-day lookback period) with the daily average temperature ($TDAV$, as defined further below in this section) closest to the event day average temperature ($TDAVE$). If the 28-day lookback period does not include four similar non-event days, extend the lookback period until four such days are included. The four selected similar days are referred to as the aggregation’s “baseline days”. Sum the device’s actual load, or estimated load, for a measurement interval across all devices in the aggregation; do this separately for both event days and baseline days.

The EB of the aggregation during a measurement interval is the average aggregate load in the interval across the selected baseline days. The sum of the device load, during a measurement interval in the event day, across all devices in the aggregation, is the aggregation’s event day aggregate load in that interval.

- Step 2: Calculate the day-of adjustment value (DOAV) for each baseline day. A DOAV shall not be less than 0.60 or greater than 1.40. The DOAV is a ratio of (a) the aggregation’s average load across the first 12 measurement intervals of the 16 intervals prior to the start of the event (including core and shoulder hours) to (b) the aggregation’s average load across the same intervals from the baseline day selected in accordance with Step 1 above. If (a) is zero, the DOAV is set to 0.60. If (b) is zero, the DOAV is set to 1.40. If both (a) and (b) are zero, the DOAV is set to 1.0.
- Step 3: Calculate the adjusted energy baseline (AEB). When the EB is greater than zero, the AEB for a load flexibility VPP event is calculated by multiplying the EB by the DOAV. If the EB is less than zero in an interval, the AEB shall be equal to the EB (that is, DOAV treated as 1).
- Step 4: Calculate the aggregate incremental load reduction (ILR) during each event interval. The aggregation’s incremental load reduction (ILR) for each interval is the AEB minus the event day aggregate load in that interval.

$$ILR_{a,e,i} = AEB_{a,e,i} - Load_{a,e,i}$$

Daily Average Temperature

The daily average temperature, $TDAV$ (referenced in Step 1 above), for each UDC territory is defined as the UDC-wide composite daily average of the high and low temperatures between the hours of 4:00 p.m.–10:00 p.m. across one or more

¹² The 10 non-excluded weekdays will be selected for weekday events; for weekend and holiday events, the 4 non-excluded weekend and holiday days will be selected.

California Measurement Advisory Council (CALMAC) weather stations within the UDC territory.¹³

The UDC-wide composite daily average temperature ($TDAV$) for UDC territory u on date d is the weighted average of the daily average of a weather station's high ($Tmax$) and low ($Tmin$) temperatures (in the hours between 4:00 p.m.–10:00 p.m.) across all stations, using temperature weight W for each station s in the UDC territory:

$$TDAV_{u,d} = \text{sum}((TMax_{s,d} + TMin_{s,d})/2 * W_{u,s})$$

The temperature weights applicable to stations in a UDC territory are determined by CEC at the end of the season based on the method described in Appendix A. Station selection is contingent on availability of sufficient CALMAC weather data. UDC temperature weights may be updated if specific stations need to be excluded due to insufficient weather data for the program season. If the UDC temperature weights need to be updated, the CEC will update the values at the end of the program season and post the values on the [Resources page](#) of the DSGS Program website at <https://dsgs.olivineinc.com/resources/>. For reference, below is a table of UDC temperature weights for various stations as calculated at the end of 2025.

13 CALMAC. "[California Weather Files,](https://www.calmac.org/weather.asp)" <https://www.calmac.org/weather.asp>.

Table 4: Temperature Weights at UDC Stations¹⁴

STATION	PG&E	SCE	SDG&E	PASADENA
BAKERSFIELD-MEADOWS-FLD	-	0.092	-	-
BLUE-CANYON-AP	0.233	-	-	-
BURBANK-GLNDLE-PASAD-AP	-	-	-	1
CORONA-MUNI-AP	-	-	0.127	-
LEMOORE-REEVES-NAS	0.198	-	-	-
LONG-BEACH-DAUGHERTY-FLD	-	0.010	-	-
LOS-ALAMITOS-AAF	-	0.091	-	-
LOS-ANGELES-IAP	-	0.372	-	-
MERCED-MUNI-MACREADY	0.016	-	-	-
OCEANSIDE-MUNI-AP	-	-	0.348	-
PLACERVILLE-AP	0.180	-	-	-
SAN-BERNARDINO-IAP	-	0.327	-	-
SAN-DIEGO-NORTH-ISLAND-NAS	-	-	0.381	-
SAN-JOSE-REID-HILLV	0.237	-	-	-
SANDBERG	-	0.108	-	-
SANTA-ANA-JOHN-WAYNE-AP	-	-	0.144	-
STOCKTON-METRO-AP	0.136	-	-	-

Source: CEC Staff

2. Performance Evaluation

A load flexibility VPP's (aggregation's) measured load impacts shall be compared against the weather-normalized capacity (WNC) for each event to determine performance and the final compensation amount.

For non-weather-sensitive resources, WNC is equal to nominated committed capacity.

For weather-sensitive resources, WNC represents the weather-dependent derating of the aggregation's committed capacity (which should reflect the aggregation's load reduction capability expected at the planning temperature *T_{Plan}* of the applicable UDC territory) and determined as described further below in this section.

The planning temperature (*T_{Plan}*) is a single value determined by CEC for each UDC for the program season and may be subject to change depending on station selection and new program season data availability.¹⁵ Planning temperatures in recent years are provided for reference below in Table 5

¹⁴ Table may be updated at the end of the program season depending on availability of weather station data.

¹⁵ A description of the method for calculating the planning temperature is available in Appendix A.

Table 5: UDC Planning Temperatures (*TPlan*)¹⁶

UDC	2021	2022	2023	2024	2025	2026
PG&E	87.9	94.5	86.4	90.4	85.2	90.5
PASADENA	88.6	98.4	88.1	101.1	89.5	99.7
SCE	82.5	88.4	83.0	87.5	83.1	88.4
SDGE	75.3	85.7	76.4	81.2	76.3	83.4

Source: CEC Staff

The WNC of a weather-sensitive aggregation ($WNC_{u,d}$) in utility territory u in month m on date d is a function of nominated committed capacity (*Nominated*), utility-specific daily average temperature (as defined before) on the event day (*TDAvE*), and the utility-specific planning temperature (*TPlan*), as defined in Table 6.

Table 6: Weather-Normalized Capacity Formula

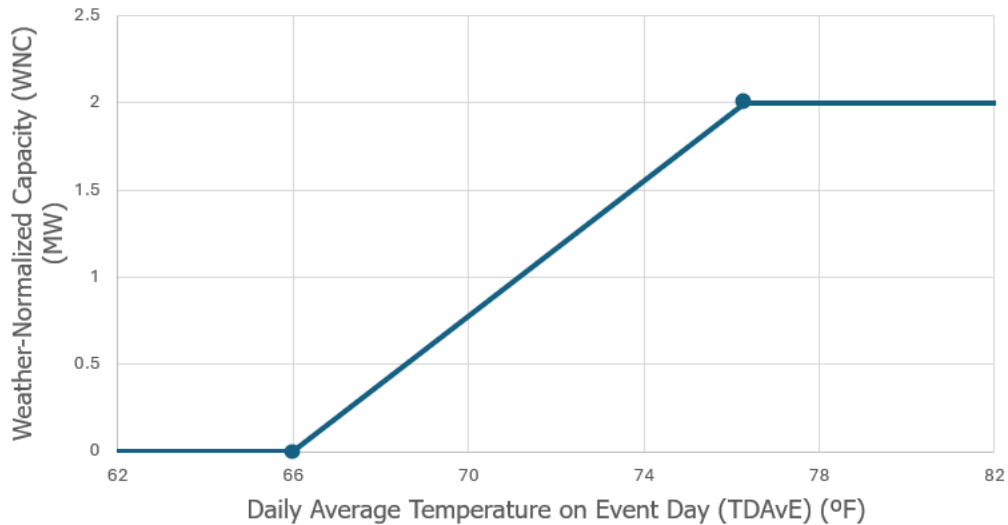
TEMPERATURE	WEATHER-NORMALIZED CAPACITY ($WNC_{u,d}$)
$TDAvE_{u,d} \leq 66$	0
$66 < TDAvE_{u,d} < TPlan_u$	$Nominated_{u,m} * (TDAvE_{u,d} - 66) / (TPlan_u - 66)$
$TDAvE_{u,d} \geq TPlan_u$	$Nominated_{u,m}$

Source: CEC Staff

For example, an aggregation of 4,000 smart thermostats with an average load reduction commitment of 0.5 kW per device equates to a nominated committed capacity of 2 MW in 2025. If this aggregation is in the SDG&E service territory, that capacity commitment value would represent the expected load reduction potential at SDG&E's 2025 planning temperature of 76.3°F. Below this level, the weather-normalized capacity of the aggregation would decrease until it reaches zero at 66°F, as shown in Figure 4.

¹⁶ The table may be updated at the end of the program season depending on the available station weather data.

Figure 4: Weather-Normalized Capacity Profile for an Aggregation in SDG&E



Source: CEC staff

Each aggregation a will be assigned a Performance score (P) of incremental load reduction (ILR) as a weighted percentage of WNC during each event interval e for the day d in utility u , using day-ahead LMP :

$$P_a = \frac{\text{sum}(ILR_{a,d,e} * LMP_{u,d,e} * (1 - 0.5 * \text{Shoulder}_{a,d,e}))}{\text{sum}(WNC_{u,a,d} * LMP_{u,d,e} * (1 - 0.5 * \text{Shoulder}_{a,d,e}))}$$

Where *Shoulder* is 1 if the interval e is a shoulder interval and 0 if it is a core interval. In the case where WNC is 0, P is assigned a value of 1 if the numerator is positive, and 0 if the numerator is negative.

3. Performance-Adjusted Compensation

In months with one or more load flex VPP events, the total compensation for an aggregation shall be adjusted based on its overall performance in the month relative to the committed capacity according to the Performance-Adjusted Capacity Payment Schedule summarized in Table 7.

Overperformance shall be compensated up to 120 percent of nominated committed capacity, and funding for 120 percent of nominated committed capacity shall be set aside, subject to the availability of funds at time of nomination.

Compensation for performance below 100 percent of nominated committed capacity shall be reduced (derated) by two times the percentage shortfall below 100 percent until the performance-adjusted compensation reaches zero as performance declines to 50 percent of nominated committed capacity.

For performance below 50 percent of nominated committed capacity, an additional 50 percent of the full nominated committed capacity compensation amount in that month

shall be deducted (penalty) from other compensation earned by the provider for the load flexibility VPP (aggregation) in other months of the program year.

Table 7: Performance-Adjusted Capacity Payment Schedule

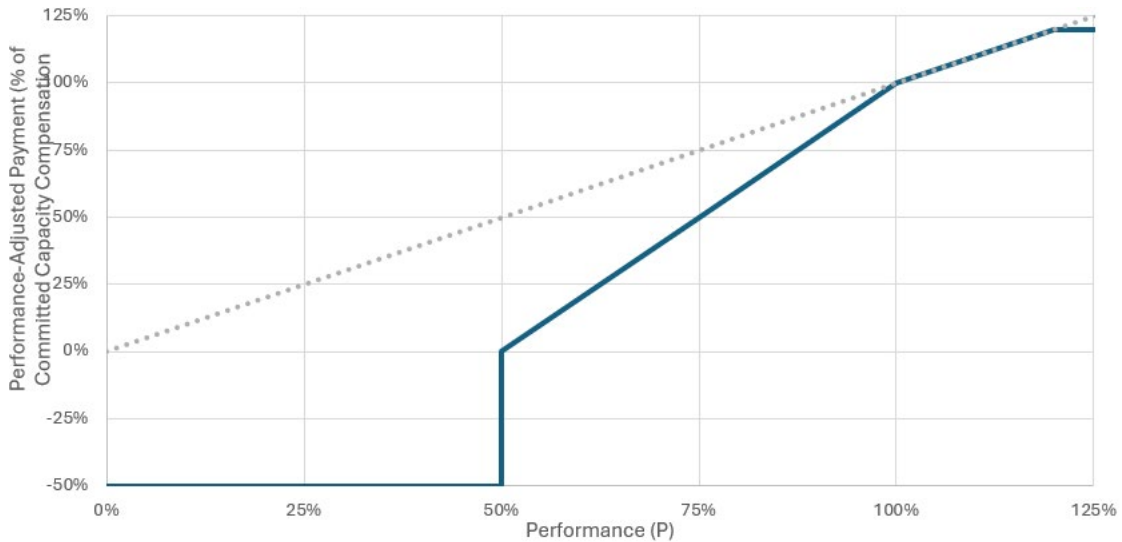
	PERFORMANCE SCORE (<i>P</i>)	PERFORMANCE-ADJUSTED CAPACITY PAYMENT
OVERPERFORMANCE	$P > 120\%$	120%
PRO-RATA	$100\% \leq P < 120\%$	P
DERATED	$50\% \leq P < 100\%$	$100\% - 2(100\% - P)$
PENALTY	$P < 50\%$	-50%

Source: CEC staff

Where the performance-adjusted capacity-payment is shown as a percent (%) of the full nominated committed capacity compensation amount.

The performance-adjusted payment schedule in each month is illustrated in Figure 5.

Figure 5: Performance-Adjusted Payment Illustration



Source: CEC staff

Additional payment terms:

1. In months without load flex VPP events, DSGS providers shall receive a performance-adjusted payment corresponding to 100% performance.
2. If the cumulative performance-adjusted payment across all months in the program season is a negative quantity, the seasonal payment to the aggregator is set to zero.
3. If the load flexibility aggregator withdraws from the program during the season, the seasonal payment is set to zero, even if the aggregator's VPP performed during an event prior to the withdrawal.

4. Any funds remaining in the load flexibility aggregator's set aside for compensation after calculating the performance payments will be released from the set aside.

CHAPTER 7:

Program Payments

This chapter identifies the information and steps to receive administrative costs and incentive payments.

A. Incentive Payments

DSGS providers shall pay eligible incentive amounts under Participation Option 1 directly to their participants and submit to the CEC claims for administrative costs and incentive payments. Participants enrolled directly with the CEC shall submit to the CEC claims for incentive payments. DSGS providers shall submit to the CEC claims for incentive payments under Participation Options 2, 3, and 4 and shall allocate incentive payments between the DSGS provider and its participants pursuant to the terms and conditions agreed to between the DSGS provider and participant.

B. Administrative Costs

1. The CEC shall reimburse each DSGS provider for up to \$1 million per year in administrative costs associated with implementing Participation Option 1. The DSGS provider shall select one of the following administrative cost structures:
 - a. Actual incremental costs incurred in administering Participation Option 1, such as costs derived from employee timesheets or invoices from third-party contractors, pending specified conditions, and for indirect/overhead costs (not to exceed 10 percent of actual incremental costs or a federally approved indirect rate from a federal agency as evidenced by an approval letter).
 - b. Ten percent of incentive payments provided to participants under Participation Option 1, or if an electrical corporation, 5 percent of incentive payments provided to participants under Participation Option 1.
2. The CEC shall also reimburse for the following actual costs incurred by utilities and federal power marketing administrations in facilitating an aggregator's administration of the program in the utility's service territory and a direct participant's participation in the program:
 - a. Costs incurred to verify customers are eligible to enroll in the program.
 - b. Costs incurred to provide customer data necessary for program enrollment and incentive claims.

These costs may be reimbursed directly to the utility or federal power marketing administration, or to the DSGS provider billed for direct costs. Each utility and federal power marketing administration is limited to reimbursement of up to \$250,000 each year in actual incremental costs.

C. Process for Requesting Administrative Costs and Incentive Payments

1. Claim Timing

The CEC shall accept and review claims for administrative costs and incentive payments on a first-come, first-served basis.

- a. Participation Option 3 and Participation Option 4 claims must be submitted for review by the last business day of November of the same calendar year in which the program season occurred. All other claims must be submitted by the last business day of February of the following calendar year. The date and time of the electronically submitted completed claim will establish the order in the queue for review of claims. DSGS providers will not be penalized for late claim submissions if the CEC has an outstanding data request necessary to submit a claim.
- b. The CEC shall notify claimants if claim packages are incomplete. The claimant shall supplement the incomplete claim within 10 business days. Failure to respond within the 10 business days will result in the cancellation of the claim.
- c. The cancellation of a claim does not preclude a claimant from resubmitting a claim, but the date and time of the electronic resubmission will determine the order of review of the claim. The claimant must explain the changes in the re-submitted claim and how the issues for the initial rejection are addressed.

2. Claim Packages

a. DSGS Provider Claim Package

DSGS providers must include the following items:

- i. The following information in a format provided by the CEC:
 - Reporting period
 - DSGS provider name
 - DSGS provider's contact name, title, email address, and phone number
 - For each participant with resources enrolled in Participation Option 1:
 - Participant name
 - Type of resources dispatched, including the applicable loading order category (for example, demand response or efficiency resource, renewable or zero-emission resources, near-zero-emission resource, biomethane or natural gas resource, or diesel backup generator or other conventional resource, or any combination of the above)
 - Address where each resource is located and customer identification number (both must match the information provided in the participation reports)
 - Verified incremental load reduction (kWh) delivered to the grid each hour of each dispatch period during the reporting period

- Eligible standby commitment amount (in kWh) each hour during the reporting period, as described in Chapter 3
- Amount of incremental increases in customer demand charges that result from participation in the program during the billing period in which a DSGS Program event occurred, if any, and supporting documentation
- Documentation demonstrating load-reduction activities, such as meter data and supporting calculations showing how the claimant calculated the baseline and load-reduction amount.
- For participation under Participation Option 2, if requested by the CEC:
 - Real-time market bids and self-schedules (in kWh) by Resource ID
 - Total expected energy (TEE, in kWh) by Resource ID
 - Demand response energy measurement (DREM, in kWh) by Resource ID
 - Customer-weighted average of daily high and low temperature by dispatch event
- ii. For administration of Participation Option 1, amount of administrative costs being claimed based on the selected administrative cost reimbursement structure described in Chapter 7, Section B.1. Claims seeking reimbursement based on incremental administrative costs must provide supporting documentation.
- iii. Payee data record (STD-204). If the designated payee has already submitted a complete STD-204 form with a prior reimbursement claim and has received a payment within the past year from the CEC, a new STD-204 is not needed.
- iv. Attestation, submitted by an officer under penalty of perjury, that the requested payment will reimburse eligible incentive payments and administrative costs and that the information submitted is complete and accurate.

b. Direct Participant Claim Package

Participants enrolled directly with the CEC must provide the following items:

- i. The following information in a format provided by the CEC:
 - Reporting period
 - Participant name
 - Participant’s contact name, title, email address, and phone number
 - For each load-reduction resource:
 - Load-serving entity for the resource
 - Type of resource, including the applicable loading order category (for example, demand response or efficiency resource, renewable or zero-emission resources, near-zero-emission resource, biomethane or

natural gas resource, or diesel backup generator or other conventional resource, or any combination of the above)

- Address where the resource is located
 - Eligible standby (in kWh) each hour during the reporting period, as described in Chapter 3
 -
 - Interval meter data (or if IOU customer, authorize data sharing with DSGS admin) or other documentation evidencing load-reduction activities if interval meter data are not available.
 - Amount of incremental increases in customer demand charges that result from participation in the program during the billing period in which a DSGS Program event occurred, if any, and supporting documentation
- ii. Payee data record (STD-204). If the designated payee has already submitted a complete STD-204 form with a prior reimbursement claim and has received a payment within the past year from the CEC, a new STD-204 is not needed.
 - iii. Attestation, submitted by an officer under penalty of perjury, that the requested payment will reimburse eligible incentive payments and to the information submitted is complete and accurate.

c. Utility and Federal Power Marketing Administration Claim Package for Administrative Cost

Utilities and federal power marketing administrations claiming incremental costs pursuant to Chapter 7, Section B.2, must provide the following items:

- i. Reporting period
- ii. Utility or federal power marketing administration name
- iii. Contact person's name, title, email address, and phone number
- iv. Amount of administrative costs being claimed
- v. Documentation evidencing claimed administrative costs
- vi. Payee data record (STD-204). If the designated payee has already submitted a complete STD-204 form with a prior reimbursement claim and has received a payment within the past year from the CEC, a new STD-204 is not needed.
- vii. Verification in writing that:
 - The payment will reimburse eligible administrative costs.
 - The utility or federal power marketing administration is not receiving compensation from another source for the administrative costs included in the claim.
 - The information submitted is accurate and complete.
 - The utility or federal power marketing administration agrees to the requirements of the terms listed in Chapter 7, Section S.

3. Claim Review and Approval

If, during the claim review, a complete and timely submitted claim package is found to contain minor errors, discrepancies, or omissions, the CEC will request clarification from the claimant. The claimant will be responsible for providing all information requested by the CEC to process the request. The CEC may impose a reasonable deadline for claimants to respond to and provide any information requested under this section. Failure to respond by the deadline provided will result in the cancellation of the claim.

If a claimed cost in the claim package is found to be ineligible for reimbursement, the CEC will not approve the claimed cost.

Payment of approved eligible incentive payments and administrative costs reimbursements will be made to the payee according to the Payee Data Record (STD-204).

CHAPTER 8:

Administration

A. Effective Date of Guidelines

This edition of the DSGS Program Guidelines will take effect immediately upon approval at a CEC business meeting. The CEC will post the adopted DSGS Program Guidelines on its [website](https://www.energy.ca.gov/programs-and-topics/programs/demand-side-grid-support-program), available at <https://www.energy.ca.gov/programs-and-topics/programs/demand-side-grid-support-program>.

Applicants and interested persons may also obtain the program guidelines by contacting DSGS@energy.ca.gov.

B. Compliance and Verification

As a condition of receiving a DSGS incentive, DSGS providers and participants must agree to provide the CEC with access to relevant documents to verify load-reduction activities and confirm that funding is being used to reimburse eligible administrative costs and incentive payments as directed by DSGS Program Guidelines. CEC staff, and its agents, may take various steps, as needed, to ensure compliance with program requirements.

DSGS providers and participants must agree to provide information, access to participant application records, and documentation evidencing load-reduction activities as reasonably requested by CEC staff, or its agent, to verify eligibility for DSGS incentives. These steps may include:

1. Requesting relevant documents or other materials from the DSGS provider or participant.
2. Contacting the participant or its retail supplier.
3. Contacting the California ISO or applicable balancing authority.
4. Performing an audit, as discussed below in Section E.

C. Enforcement

In addition to any other rights the CEC has, the CEC may take any of the following actions necessary to enforce the CEC's rights and program requirements. By applying for funds under this program, DSGS providers and participants agree that any effort to enforce this funding arrangement in court shall have the venue in Sacramento County, and this funding arrangement shall be interpreted in accordance with and governed in all respects by California law.

1. Recovery of Overpayment

In addition to all rights and remedies available to the CEC, the CEC may direct its chief counsel to commence formal legal action against any current or former DSGS provider or participant to recover any portion of an incentive or administrative payment, and any other amounts due under the law, that the CEC's executive director determines the

DSGS provider or participant or former DSGS provider or participant was not otherwise entitled to receive.

2. Fraud and Misrepresentation

The executive director may initiate an investigation of any current or former DSGS provider, participant, or applicant that the executive director has reason to believe may have misstated, falsified, or misrepresented information in submitting an application, reimbursement request, or any reporting or other information required under the program. Based on the results of the investigation, the executive director may take any action deemed appropriate, including, but not limited to, removal from the program and recovery of any overpayment, and, with the concurrence of the CEC, recommending the Attorney General initiate an investigation and prosecution under Government Code Section 12650, et seq., or other provisions of law.

3. Noncompliance With Guidelines

The CEC may seek remedies for noncompliance with guideline requirements and terms, including, but not limited to, termination of enrollment, withholding requested payments, recovery of funds, or any other administrative or civil action.

Without limiting any of its other remedies, the CEC may, for eligible DSGS provider's, participant's, or applicant's noncompliance with any guideline requirement, withhold future reimbursement payments, demand and be entitled to repayment of past reimbursements, and suspend or cancel the DSGS provider's or participant's enrollment.

D. Audits

DSGS providers and participants shall keep separate, complete, and correct accounting of the costs involved in participating in this program, as applicable. The CEC, the Bureau of State Audits, or their authorized agents may audit any applicant or participant to verify compliance with all program requirements, including the accuracy of any information included as part of the application, reimbursement claim, or report required under these guidelines. As part of an audit, a DSGS provider or participant may be required to provide the CEC or its authorized agents with all information and records necessary to verify the accuracy of any information included in the DSGS provider's or participant's application, reimbursement claims, or reports. A DSGS provider or participant may also be required to open its business records for on-site inspections and audit by the CEC or its authorized agents to verify the accuracy of any information included therein. An audit may be performed at any time within five years after payment by the CEC of the DSGS provider's or participant's final claim payment.

If an audit finds that a DSGS provider or participant has incorrectly stated or falsified information included on the DSGS provider's or participant's application, claims, or reports, the CEC shall notify the DSGS provider or participant of its findings in writing within 30 days of completing the audit. Based on the audit results and without limiting any of CEC's other rights, a DSGS provider or participant may be required to refund all or a portion of the DSGS claim payments it has received. In addition, the DSGS provider's or

participant's enrollment may be terminated and enforcement actions initiated following Section D of Chapter 8: Administration.

E. Authorized Third Parties

Authorized third parties may complete applications on behalf of an eligible DSGS provider but may not sign attestations on their behalf. A letter of authorization from the DSGS provider specifying any authority or responsibility delegated to the third party is required as part of the application package.

F. Records Retention: Use and Disclosure of Information and Records and Confidentiality

Any entity receiving a DSGS payment from the CEC must retain all records required to be submitted to the CEC for a period of five years after the date the project receives its final, or most recent, incentive payment from the CEC. Unless an applicable exception or exemption to public disclosure applies, all documents submitted to the CEC or its technical assistance providers, including as part of any audit, are considered public records subject to disclosure under the California Public Records Act. The CEC or other state agencies may also use any of these documents or information for any purpose, including to determine eligibility and compliance with the DSGS Program, applicable law, or a particular guideline document; evaluate related or relevant programs or program elements; or prepare reports. These documents and information include, but are not limited to, applications, invoices, and any documentation submitted in support of the applications; all incentive deliverables; and documents prepared for other reporting requirements.

If the CEC requires a DSGS provider or participant to provide copies of records that the DSGS provider or participant believes contain confidential, proprietary, or any other information entitled to protection under the California Public Records Act or other law, the DSGS provider or participant may request that such records be designated confidential according to the CEC's regulations for confidential designation, Title 20, California Code of Regulations, Section 2505. If the DSGS provider or participant believes that the record should not be disclosed because it contains trade secrets or its disclosure would otherwise cause loss of a competitive advantage, the application for confidential designation shall also state the specific nature of that advantage and how it would be lost, including the value of the information to the applicant, and the ease or difficulty with which the information could be legitimately acquired or duplicated by others. If the confidential information within a document can be redacted without removing the portion of the record that is required for verification of compliance with these guidelines, the DSGS provider or participant shall submit versions of documents with the confidential information masked or redacted rather than requesting confidential designation. Questions regarding whether redactions may inhibit verification of compliance with these guidelines should be submitted to CEC staff with sufficient time to resolve the question before reimbursement.

DSGS providers and participants considering confidentiality should note that DSGS funds are subject to information disclosure requirements to ensure transparency. Information concerning the identity of DSGS providers and participants and the amounts provided are public information and will be published in CEC reports and disclosed in response to requests filed under the California Public Records Act. This information, as well as other public information, may also be disclosed through the CEC's website, another State of California agency website, or through other means. The CEC will not disclose information in a manner that is otherwise protected by the Public Records Act, including qualifying trade secrets or confidential or privileged information, including energy use.

In addition to any other disclosure requirements under the law, the CEC can disclose confidential information and records to other governmental entities, including other local, state, or federal agencies that are funding eligible projects, and law enforcement authorities for civil and criminal investigation and enforcement.

G. Nondiscrimination Statement of Compliance

While participating in the DSGS Program, DSGS providers, DSGS participants, and subcontractors will not unlawfully discriminate, harass, or allow harassment against any employee or applicant for employment because of any of the following:

- Sex
- Sexual orientation
- Race
- Color
- Ancestry
- Religious creed
- National origin
- Physical disability (including HIV and AIDS)
- Mental disability
- Medical condition
- Age
- Genetic information
- Gender
- Gender identity
- Gender expression
- Military and veterans status
- Marital status
- Denial of family care leave

DSGS providers, DSGS participants, and subcontractors will ensure that the evaluation and treatment of their employees and applicants for employment are free from such discrimination and harassment.

DSGS providers, DSGS participants, and subcontractors shall comply with the provisions of the Fair Employment and Housing Act (Government Code Sections 12990 et seq.) and the applicable regulations promulgated thereunder (California Code of Regulations, Title 2, Section 11000 et seq.). The applicable regulations of the Fair Employment and Housing Commission implementing Government Code Section 12990 (a-f), set forth in Chapter 5 of Division 4.1 of Title 2 of the California Code of Regulations, are incorporated into these guidelines by reference and made a part of it as if set forth in full. The DSGS provider, DSGS participants, and subcontractors will give written notice of their obligations under this section to labor organizations with which they have a collective bargaining or other agreement.

DSGS providers shall include and shall ensure all subcontractors include the nondiscrimination and compliance provisions in this section in all subcontracts under this program.

H. Drug-Free Workplace Certification

By participating in the DSGS Program, the DSGS provider certifies under penalty of perjury under the laws of the State of California that it will comply with the requirements of the Drug-Free Workplace Act of 1990 (Government Code Section 8350 et seq.) and will provide a drug-free workplace by taking the following actions:

1. Publish a statement notifying employees that unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance is prohibited and specifying actions to be taken against employees for violations as required by Government Code Section 8355(a).
2. Establish a Drug-Free Awareness Program as required by Government Code Section 8355(b) to inform employees about:
 - The dangers of drug abuse in the workplace.
 - The person's or organization's policy of maintaining a drug-free workplace.
 - Any available counseling, rehabilitation, and employee assistance programs.
 - Penalties that may be imposed upon employees for drug abuse violations.
3. Provide, as required by Government Code Section 8355(c), that every employee who works on the proposed project:
 - Will receive a copy of the company's drug-free policy statement.
 - Will agree to abide by the terms of the company's statement as a condition of employment on the project.

In addition to any other rights and remedies available to the CEC, failure to comply with these requirements may result in suspension of payments under the DSGS Program or

termination of participation, and the DSGS provider may be ineligible for any future state awards if the CEC determines that any of the following has occurred: (1) the DSGS provider has made false certification or (2) violates the certification by failing to carry out the requirements as noted above.

I. Americans With Disabilities Act

By participating in the DSGS Program, the DSGS provider assures the CEC that it complies with the Americans with Disabilities Act (ADA) of 1990 (42 U.S.C. Section 12101, et seq.), which prohibits discrimination on the basis of disability, as well as applicable regulations and guidelines issued pursuant to the ADA.

J. Air or Water Pollution Violation

This term applies to DSGS providers receiving more than \$10,000. Under state laws, DSGS providers shall not be (1) in violation of any order or resolution not subject to review promulgated by the California Air Resources Board or an air pollution control district, (2) subject to cease and desist order not subject to review issued under Section 13301 of the Water Code for violation of waste discharge requirements or discharge prohibitions, or (3) finally determined to be in violation of provisions of federal law relating to air or water pollution.

K. Prompt Payment

Payment will be made in accordance with the Prompt Payment Act, Government Code Chapter 4.5, commencing with Section 927, which requires payment of properly submitted, undisputed invoices within 45 days of receipt or the automatic calculation and payment of appropriate late payment penalties when applicable.

The CEC's financial obligations under these guidelines are strictly limited to the amounts expressly appropriated and legally available for the purposes of the DSGS program. The CEC has no obligation to provide funding or payments for DSGS providers' or participants' activities that exceed the CEC's authorized funding limitations.

L. Amendments

No amendment or variation of the terms of the agreement between the CEC and DSGS providers shall be valid unless made in writing, signed by the parties, and approved as required. No oral understanding or agreement not incorporated in the agreement is binding on any of the parties.

M. Termination Without Cause

The CEC may terminate agreements with a DSGS provider without cause upon giving written notice. In this event, the DSGS provider will use all reasonable efforts to mitigate its expenses and obligations.

N. Public Works

If a DSGS provider engages in public works or has subcontractors or DSGS participants engage in public works under this program, the DSGS provider shall comply with all applicable public works laws (for example, Labor Code Section 1720 et seq.), a requirement of which is to pay prevailing wages. If an entity engages in public works, then it is subject to compliance monitoring and enforcement by the Department of Industrial Relations.

O. Independent Capacity

In their performance under this program, DSGS providers, DSGS participants, and subcontractors and their respective agents and employees will act in an independent capacity and not as officers, employees, or agents of the CEC or the State of California.

P. Third-Party Beneficiary

DSGS providers shall ensure every subcontract and agreement with DSGS participants under this program includes a provision indicating the CEC is a third-party beneficiary to the agreement.

Q. Travel and Per Diem

1. Any travel for which DSGS providers and subcontractors want to be reimbursed must be preapproved in writing by the CEC before such costs are incurred.
2. The CEC shall only pay travel and per diem up to, but not to exceed, the rates allowed for unrepresented state employees. Current allowable travel reimbursement rates can be obtained from the CEC at http://www.energy.ca.gov/contracts/TRAVEL_PER_DIEM.PDF.
3. DSGS providers and their subcontractors shall not invoice for or spend, and the CEC shall not pay, any CEC funds for food or beverages other than for allowable per diem charges. DSGS providers and their subcontractors are responsible for any amounts more than this allowed amount.
4. DSGS providers and their subcontractors shall not invoice for or spend, and the CEC shall not pay, any CEC funds for alcohol or travel and meals for non-DSGS, entertainment, or public relations purposes.
5. DSGS providers shall not allow subcontractors to invoice for, and the CEC shall not pay, any funds for a profit amount greater than 10 percent.

R. Flow-Down Requirements

DSGS providers shall flow down in their agreements with subcontractors and DSGS direct participants and shall ensure subcontractors flow down in their subcontracts, the requirements in the following terms:

- Compliance and Verification (Chapter 8, Section C)
- Enforcement (Chapter 8, Section D)
- Audits (Chapter 8, Section E)

- Records Retention (Chapter 8, Section G)
- Nondiscrimination Statement of Compliance (Chapter 8, Section H)
- Drug-Free Workplace Certification (Chapter 8, Section I)
- Americans With Disabilities Act (Chapter 8, Section J)
- Air and Water Pollution Violation (Chapter 8, Section K)
- Prompt Payment (Chapter 8, Section L)
- Public Works (Chapter 8, Section O)
- Third-Party Beneficiary (Chapter 8, Section Q)
- Travel and Per Diem (Chapter 8, Section R)
- Flow-Down Requirements (Chapter 8, Section S, this section)
- Survival of Terms (Chapter 8, Section V)
- A provision indicating the person or entity agrees to comply with all applicable laws and DSGS Program requirements.

S. Severability

If any provision of these guidelines is unenforceable or held to be unenforceable, all other provisions of these guidelines will remain in full force and effect.

T. Waiver

No waiver of any breach of these guidelines constitutes waiver of any other breach. All remedies in these guidelines will be taken and construed as cumulative, meaning in addition to every other remedy provided in the guidelines or by law.

U. Survival of Terms

Certain provisions will survive the withdrawal of a DSGS provider or participant from the program for any reason. The provisions include, but are not limited to:

- Program Payments (Chapter 7).
- Compliance and Verification (Chapter 8, Section C).
- Enforcement (Chapter 8, Section D).
- Audits (Chapter 8, Section E).
- Records Retention: Use and Disclosure of Information and Records and Confidentiality (Chapter 8, Section G).
- Public Works (Chapter 8, Section O).
- Third-Party Beneficiary (Chapter 8, Section Q).
- Severability (Chapter 8, Section T).
- Waiver (Chapter 8, Section U).
- CEC's financial Survival of Terms (Chapter 8, Section V, this section)

Reference Documents

[Assembly Bill 205 \(Committee on budget, Stats. 2022, Ch. 61\)](https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220AB205)

https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220AB205

[Assembly Bill 209 \(Committee on budget, Stats 2022, Ch. 251\)](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB209)

https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB209

[California ISO Emergency Notifications Fact Sheet](http://www.caiso.com/Documents/Emergency-Notifications-Fact-Sheet.pdf)

<http://www.caiso.com/Documents/Emergency-Notifications-Fact-Sheet.pdf>

[North American Electric Reliability Corporation Reliability Standard EOP-011-1](https://www.nerc.com/pa/Stand/Reliability%20Standards/EOP-011-1.pdf)

<https://www.nerc.com/pa/Stand/Reliability%20Standards/EOP-011-1.pdf>

GLOSSARY

Key Words and Terms

Word/Term	Definition
Aggregator	An entity that enrolls multiple customers, manages the customer relationship, forms an aggregation of behind-the-meter resources of multiple customers to be dispatched in a coordinated manner in response to a signal for the benefit of a load-serving entity, utility or balancing authority, and receives DSGS compensation for performance delivered by its aggregation.
Agricultural and Pumping Interruptible Program	A demand response program in Southern California Edison's (SCE) territory that offers monthly bill credits to businesses that agree to temporarily interrupt their electricity service during peak energy demand.
Balancing authority area	A balancing authority area means the collection of generation, transmission, and loads within the metered boundaries of the area within which the balancing authority maintains the electrical load-resource balance (Public Utilities Code Section 399.12[c]).
Base Interruptible Program (BIP)	A program created by the CPUC and managed by the state's IOUs that pays customers to reduce their electricity use during electrical grid emergencies.
Behind the Meter (BTM)	Refers to energy resources located on the customer's side of the utility meter, including resources connected to a dedicated net generation output meter (NGOM) and participating in virtual net metering (VNEM)
Balancing Authority	An entity that manages the operation of the electric power system within a specific geographic area. The goals of a balancing authority are to maintain balance between power demand and supply and to sustain safe and reliable operation of the power system.
California Independent System Operator (California ISO)	A balancing authority serving most of California. California ISO oversees the operation of California's bulk electric power system, transmission lines, and electricity markets.

California Public Utilities Commission (PUC)	The California Public Utilities Commission is the state agency charged with regulating privately owned utilities (electric, natural gas, telecommunications, water), railroad, rail transit, and passenger transportation companies.
California Energy Commission (CEC)	<p>State Energy Resources Conservation and Development Commission, commonly called the California Energy Commission, the Energy Commission, or the CEC. The state's primary energy policy and planning agency. The agency was established by the California Legislature through the Warren-Alquist Act in 1974. It has seven core responsibilities:</p> <ul style="list-style-type: none"> (1) Developing renewable energy (2) Transforming transportation (3) Increasing energy efficiency (4) Investing in energy innovation (5) Advancing state energy policy (6) Certifying thermal power plants (7) Preparing for energy emergencies <p>This term also includes any entity the CEC has contracted with to implement all or part of this program.</p>
Cogeneration	The simultaneous production of electricity and heat, where the latter is used for a useful function to improve overall efficiency of the system.
Community choice aggregator	<p>Community choice aggregator means any of the following entities, if that entity is not within the jurisdiction of a local publicly owned electric utility, that provided electrical service as of January 1, 2003:</p> <ul style="list-style-type: none"> (a) Any city, county, or city and county whose governing board elects to combine the loads of its residents, businesses, and municipal facilities in a communitywide electricity buyers' program. (b) Any group of cities, counties, or cities and counties whose governing boards have elected to combine the loads of their programs, through the formation of a joint powers agency established under Chapter 5 (commencing with Section 6500) of Division 7 of Title 1 of the Government Code. (c) The Kings River Conservation District, the Sonoma County Water Agency, and any California public agency possessing statutory authority to generate and deliver electricity at retail within its designated jurisdiction, provided the entity may only

	combine the loads of residences, businesses, and governmental facilities of cities and counties within, or contiguous to, its jurisdiction that have, by resolution exercised pursuant to paragraph (12) of subdivision (c) of Section 366.2, requested the agency to implement a community choice aggregation program. (Public Utilities Code Section 331.1.)
Customer(s)	A utility service account representing a home, business, or other entity.
Demand Response	Customers make temporary or recurring changes in their energy consumption profile (typically reduce or shift net demand) in response to grid or price signals to provide grid services in exchange for incentives or compensation from an energy service provider, utility, or California ISO.
DSGS Program event	DSGS Program events include the dispatch periods described in the DSGS Guidelines for the various participation options to prompt enrolled devices to reduce demand or increase supply to reduce stress on the power grid.
DSGS provider	A retail supplier as defined in Public Utilities Code Section 398.2, federal power marketing administrations, and aggregators of customers enrolled with the CEC to administer the DSGS Program for participants.
EEA Watch	An Energy Emergency Alert Watch issued by the California ISO when analysis shows all available resources are committed or forecasted to be in use, and energy deficiencies are expected. Market participants are encouraged to offer supplemental energy (California ISO Emergency Notifications Fact Sheet , https://www.caiso.com/documents/emergency-notifications-fact-sheet.pdf).
EEA 1	An Energy Emergency Alert 1 as defined in the North American Electric Reliability Corporation's Reliability Standard EOP-011-1. A balancing authority issues an EEA 1 when it is experiencing conditions where all available generation resources are committed to meet firm load, firm transactions, and reserve commitments, and is concerned about sustaining its required contingency reserves.
EEA 2	An Energy Emergency Alert 2 as defined in the North American Electric Reliability Corporation's Reliability Standard EOP-011-1. A balancing authority issues an EEA 2 when it is no longer able to provide its expected energy requirements and is energy deficient.

EEA 3	An Energy Emergency Alert 3 as defined in the North American Electric Reliability Corporation’s Reliability Standard EOP-011-1. An energy deficient balancing authority issues an EEA 3 when it is unable to meet minimum contingency reserve requirements.
Electric Vehicle Supply Equipment (EVSE)	The equipment that connects an electric vehicle (EV) to a power source to charge its battery.
Emergency Load Reduction Program (ELRP)	A program created by the CPUC in Decision 21-03-056 and managed by the state’s IOUs to pay electricity consumers for reducing energy consumption or increasing electricity supply during electrical grid emergencies.
Energy Baseline	An estimate of typical energy demand for a given customer during a DR event, usually based on historical behavior of that resource.
Extreme event	An extreme event is defined in Public Resources Code Section 25790.5(b) to mean either of the following: (a) An event occurring at a time and place in which weather, climate, or environmental conditions, including temperature, precipitation, drought, fire, or flooding, present a level of risk that would constitute or exceed a one-in-ten event, as referred to by the North American Electric Reliability Corporation, including when forecast in advance by a load-serving entity or local publicly owned electric utility. (b) An event where emergency measures are taken by a California balancing authority, including when forecast in advance by the California balancing authority.
Holiday	For defining “weekend/holiday” days for day-matching energy baseline calculations, the following are considered holidays: Memorial Day, Independence Day (Observed), and Labor Day.
Investor-owned utility (IOU)	As used in this document, investor-owned utilities include Pacific Gas and Electric Company (PG&E), Southern California Edison, and San Diego Gas & Electric Company (SDG&E).
Load reduction	A decrease in electric demand as measured at a customer site relative to a counterfactual baseline. Load reductions include behind-the-meter generation or storage discharge that result in negative demand (that is, exports) except where otherwise prohibited.

Load-serving entity	An electric customer's retail supplier or federal power marketing administration.
Local publicly owned electric utility (POU)	Local publicly owned electric utility means a municipality or municipal corporation operating as a "public utility" furnishing electric service as provided in Section 10001, a municipal utility district furnishing electric service formed pursuant to Division 6 (commencing with Section 11501), a public utility district furnishing electric services formed pursuant to the Public Utility District Act set forth in Division 7 (commencing with Section 15501), an irrigation district furnishing electric services formed pursuant to the Irrigation District Law set forth in Division 11 (commencing with Section 20500) of the Water Code, or a joint powers authority that includes one or more of these agencies and that owns generation or transmission facilities, or furnishes electric services over its own or its member's electric distribution system (Public Utility Code Section 224.3).
Locational Marginal Price (LMP)	The marginal price for energy at the location where the energy is delivered or received and is based on forecasted system conditions and the latest approved real-time security constrained economic dispatch program solution. LMP is expressed in dollars per megawatt-hour (\$/MWh). LMP is a pricing approach that addresses Transmission System congestion and loss costs, as well as energy costs.
Maximum Committed Capacity (MaxCC)	The maximum allowed total committed capacity across all aggregators for Option 4.
Nameplate Energy Storage Capacity	The manufacturer's published maximum usable energy storage capacity (kWh) for a given energy storage product.
Nameplate Power Rating	The manufacturer's published theoretical maximum discharge power (kW) for a given energy storage product.
Participant	An energy customer that has enrolled in the DSGS Program
Proxy Demand Resource (PDR)	Economic demand response composed of a load or aggregation of loads that bid into the California ISO market under normal operating conditions.
Rule 21	CPUC Electric Rule 21 is a tariff that describes the interconnection, operating, and metering requirements for generation facilities to be connected to a utility's distribution system.

Self-Generation Incentive Program (SGIP)	Administered by the CPUC, the Self-Generation Incentive Program (SGIP) provides incentives to support existing, new, and emerging distributed energy resources. SGIP provides rebates for qualifying distributed energy systems installed on the customer's side of the utility meter. Qualifying technologies include wind turbines, waste heat-to-power technologies, pressure reduction turbines, internal combustion engines, microturbines, gas turbines, fuel cells, and advanced energy storage systems.
Smart Electrical Panel	An electrical panel with a communication link that enables remote monitoring and dispatch control of devices connected to the panel.
Strategic Reliability Reserve (SRR)	A state program that provides funding to secure conventional generation, efficiency upgrades at existing natural gas plants, demand response, distributed generation, and long-duration storage. The SRR consists of three programs, two of which are administered by the CEC, and one is administered by the Department of Water Resources.
Subcontract	An executed contract between a DSGS provider and a person or entity assisting the DSGS provider in fulfilling the requirements of this program that is not a DSGS participant.
Subcontractor	A person or entity that executes a subcontract with a DSGS provider.
Virtual Net Metering (VNEM)	A system where customers receive credit on their electricity bills for power generated from a solar-plus-storage system that is not installed on their home. For example, the benefits of a solar-plus-storage system can be shared by multiple tenants in a multifamily residential building.
Virtual Power Plant (VPP)	A network of behind-the-meter customer operated distributed energy resource (DER) devices that respond to a grid signal to benefit the electric grid.

APPENDIX A:

Participation Options 2, 3 and 4 – Selected Topics

A. Option 2 Compensation Allocation Method

Available Option 2 funds for 2026 season shall be allocated to each participating provider based on the CEC-validated cumulative performance-based capacity compensation for the provider’s aggregations in the 2026 program season, up to their pro-rata share of the total *uncapped* compensation across all participating Option 2 providers in the season.

Below is an example of the Option 2 allocation method. Assume four providers and a total of \$1 million available for providers:

Table 8: Example Option 2 Compensation Allocation

Provider	Uncapped Compensation	Pro-Rata share	Capped Compensation
Provider 1	\$564,000	47%	\$470,000
Provider 2	\$336,000	28%	\$280,000
Provider 3	\$192,000	16%	\$160,000
Provider 4	\$108,000	9%	\$90,000
Total	\$1,200,000	100%	\$1,000,000

Source: CEC staff

B. Option 3 Compensation Allocation Method

Except for VPP aggregators of bi-directional EVSE, participation in the 2026 program season of Option 3 is limited to storage VPP aggregators that participated in October 2025.

1. Allocation for bi-directional EVSE aggregators

\$250,000 of the total funds available for Option 3 shall be reserved for performance-based capacity compensation for bi-directional EVSE resources. The available funds shall be allocated at the aggregation level, based on each EVSE aggregation’s CEC-validated cumulative performance-based capacity compensation in the 2026 program season, up to that aggregation’s pro rata share of the total *uncapped* compensation across EVSE aggregations for the 2026 season.

2. Allocation for stationary storage aggregators

After setting aside funds for bi-directional EVSE resources (as described above) from the total funds available for Option 3, the remaining funds shall be allocated to stationary storage resources. The available funds shall be subdivided into separate funds for stationary storage aggregations of each customer class, where customer class refers to

residential versus non-residential aggregations. The funding amount allocated to each customer class shall be determined based on the ratio of the class-specific October 2025 total compensation (as determined in Step 1 below) to the sum of the residential class-specific and non-residential class-specific October 2025 total compensation.

With the available funds for each customer class, the performance-based capacity payment to each eligible participating stationary storage VPP aggregator (with aggregations associated with that customer class) for the 2026 season shall be determined as described below:

- a. Round 1 Funding Allocation: The class-specific available fund shall be allocated at the end of the 2026 program season to each aggregator based on the CEC-validated cumulative performance-based capacity compensation for their applicable class aggregations in the 2026 program season, up to their pro-rata share of the total compensation for Option 3 applicable customer class in October 2025 (referred to as "October 2025 class-specific total compensation"). The October 2025 class-specific total compensation is the sum of the per aggregator compensation that the aggregators *would* have earned in October 2025 for their applicable class aggregations based on their aggregations' demonstrated capacity relative to a measured baseline,¹⁷ as determined by the CEC using the available existing performance data for that month.
- b. Round 2 Funding Allocation: To the extent that some aggregators' cumulative performance-based capacity compensation for the 2026 season is less than their Round 1 pro-rata share described above, the remaining class-specific funds shall be pooled and re-allocated to aggregators (Round 2 funding allocation) whose total 2026 compensation for their applicable aggregations exceeded their October 2025 pro-rata share in Round 1. The Round 2 allocation to the eligible providers shall be based on their CEC-validated cumulative performance-based capacity compensation for their applicable aggregations in the 2026 program season, up to their *revised* pro-rata share for Round 2 – that is, based on their share of the October 2025 class-specific total compensation associated with only the Round 2 aggregators.

3. Additional notes related to funding allocations

- a. Any remaining funds from the \$250,000 set-aside for bi-directional EVSE shall be re-allocated to the funding available for Option 3 stationary storage resources.
- b. Any remaining funds in a customer class-specific fund shall be allocated to the other customer class, using the Round 1 & 2 processes described above.
- c. Any funds remaining in the Option 3 fund after the above steps shall be allocated to Option 2 resources.

¹⁷ The measured baseline is based on averaging the hourly aggregated discharge of an aggregation across all non-event days in the month for a given event hour and day type.

- d. For each aggregator, the CEC will disclose their October 2025 pro-rata share applicable to their customer-class specific available fund in 2026, prior to the start of the 2026 program season.

4. Option 3 allocation method example

Assume five providers and a total of \$19 million available for residential aggregations:

Round 1:

Table 9: Example Round 1 Option 3 Compensation Allocation

Provider	October 2025 Pro-Rata Share (Residential)	Max 2026 Round 1 Payment (\$M)	Uncapped 2026 Performance Payment	Round 1 Payment Allocation	Round 2 Available \$
Provider 1	35%	\$6.65	\$8.00	\$6.65	0
Provider 2	25%	\$4.75	\$5.25	\$4.75	0
Provider 3	15%	\$2.85	\$2.85	\$2.85	0
Provider 4	15%	\$2.85	\$1.50	\$1.50	\$1.35
Provider 5	10%	\$1.90	\$2.50	\$1.90	0
Total	100%	\$19.00	\$20.10	\$17.65	\$1.35

Source: CEC staff

Round 2:

Table 10: Example Round 2 Option 3 Compensation Allocation

Provider	October 2025 Revised Pro-Rata Share (Residential)	Max 2026 Payment (\$M) after Round 1	Remaining Uncapped 2026 Performance Payment	Round 2 Payment Allocation
Provider 1	50%	\$0.68	\$1.35	\$0.68
Provider 2	36%	\$0.49	\$0.50	\$0.49
Provider 5	14%	\$0.19	\$0.60	\$0.19
Total	100%	\$1.35	\$2.45	\$1.35

Source: CEC staff

Total compensation paid:

Table 11: Example Total Compensation Paid for Option 3

Provider	Uncapped 2026 Performance Payment	Round 1 Payment Allocation	Round 2 Payment Allocation	Total Payment
Provider 1	\$8.00	\$6.65	\$0.68	\$7.33
Provider 2	\$5.25	\$4.75	\$0.49	\$5.24
Provider 3	\$2.85	\$2.85	\$0	\$2.85
Provider 4	\$1.50	\$1.50	\$0	\$1.50
Provider 5	\$2.50	\$1.90	\$0.19	\$2.09
Total	\$20.10	\$17.65	\$1.35	\$19.01

Source: CEC staff

C. Option 4 Capacity Allocation Method

In case the total offered committed capacity in a month exceeds MaxCC, the CEC will allocate the available MaxCC of committed capacity to the participating aggregators for the 2026 program season as described below.

1. Round 0: Aggregators who participated in the 2025 season and received compensation will receive an initial capacity allocation for the 2026 season equal to their lowest monthly adjusted demonstrated capacity that was compensated in the same program quarter in 2025, if applicable, up to their offered committed capacity.
2. Round 1: With the remaining available capacity (equal to MaxCC minus the capacity allocation to 2025 aggregators in Round 0), all aggregators offering capacity for the 2026 season (including returning aggregators) receive an initial equal capacity allocation (equal to remaining available capacity divided by the number of aggregators), up to their offered committed capacity.
3. Round 2: If any unused capacity allocation below MaxCC remains after Round 1, then aggregators with capacity offers larger than Round 1 allocations (Round 2 aggregators) receive an additional equal capacity allocation (equal to the unused capacity allocation after Round 1 divided by the number of Round 2 aggregators), up to their offered capacity commitment.
4. Above process is continued until the entire MaxCC for the month is allocated.

Below is an example of the Option 4 allocation method. Assume three aggregators offering committed capacities of 20 MW (Aggregator 1), 30 MW (Aggregator 2), and 40 MW (Aggregator 3), and a MaxCC of 75 MW available for the first program quarter of

2026. Also assume Aggregator 1 had a minimum 12 MW adjusted demonstrated capacity in the first program quarter of 2025 and Aggregators 2 and 3 did not participate in 2025.

Round 0:

- Returning Aggregator 1 receives an initial allocation of 12 MW.

Round 1:

- After allocating 12 MW to Aggregator 1 in Round 0, 63 MW of MaxCC remains and Aggregator 1's remaining unallocated offered committed capacity is 8 MW. The equal capacity allocation for Round 1 is $63 \text{ MW} / 3 = 21 \text{ MW}$.

Table 12: Example Round 1 Option 4 Capacity Allocation

Aggregator	Remaining Offered Capacity Commitment (MW)	Round 1 Available Capacity Per Aggregator (MW)	Round 1 Capacity Allocation (MW)
Aggregator 1	8.00	21.00	8.00
Aggregator 2	30.00	21.00	21.00
Aggregator 3	40.00	21.00	21.00
Total	78.00	63.00	50.00

Source: CEC Staff

Round 2:

- Available capacity is now 13 MW ($= 63 \text{ MW} - 50 \text{ MW}$) after Round 1 capacity allocations. The equal capacity allocation for Round 2 is $13 \text{ MW} / 2 = 6.50 \text{ MW}$.

Table 13: Example Round 2 Option 4 Capacity Allocation

Aggregator	Remaining Offered Committed Capacity (MW)	Round 2 Available Capacity Per Aggregator (MW)	Round 2 Capacity Allocation (MW)	Cumulative Capacity Allocation¹⁸ (MW)
Aggregator 1	0	0	0	20.00
Aggregator 2	9.00	6.50	6.50	27.50
Aggregator 3	19.00	6.50	6.50	27.50
Total	28.00	13.00	13.00	75.00

Source: CEC Staff

After Round 2, MaxCC of 75 MW is fully allocated among the three aggregators in the 2026 program season.

¹⁸ Also referred to as the CEC-assigned provider Committed Capacity Nomination as defined in Chapter 6, Section D.

D. Temperature Weights (Option 4)

The temperature weights applicable to stations in a UDC territory will be determined by CEC at the end of the season as follows:

- Step 1: From the available CALMAC weather stations, match each station's zip code with the corresponding UDC service area.
- Step 2: Filter for stations with complete weather data during the program season in the last 10 years; exclude stations with incomplete data.
- Step 3: Use the historical temperature data from the filtered stations as independent variables in a Least Absolute Shrinkage and Selection Operator (LASSO) regression model, with historical California ISO daily peak load between 4:00 p.m.–10:00 p.m. from May through October of last 10 years as the dependent variable. The regression estimates the relationship between cooling degree days (with a reference temperature of 66°F)¹⁹ from each CALMAC weather station and UDC TAC area daily peak load. The resulting coefficients for each weather station represent the UDC temperature weights, indicating each station's relative contribution to explaining historical peak load variation.

E. Planning Temperature (Option 4)

The planning temperature is a UDC-wide composite temperature value fixed for the program season and is determined by CEC as follows:

- Step 1: Utilizing the same set of historical data of last 10 years from the 4:00 p.m.–10:00 p.m. window used to generate the UDC temperature weights above (and in Table 4), calculate the annual composite peak temperature for the UDC as a weighted average of the peak temperature across all weather stations in the UDC, using temperature weights associated with the stations.
- Step 2: Fit a Gumbel extreme value distribution per UDC territory to the UDC's composite peak temperatures over the last 10 years using a 4-year return level. The resulting temperature value is the UDC's *T_{Plan}* for the program season.

¹⁹ Using a temperature of 65 or 66° F is a standard reference temperature used in California utility load analysis, representing the threshold above which cooling demand begins to significantly impact electric load.