BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company (U39E) for Approval of Demand Response Programs, Pilots and Budgets for Program Years 2018-2022.	Application 17-01-012 (Filed January 17, 2017)
And Related Matters.	Application 17-01-018 Application 17-01-019

COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE TO THE PROPOSED DECISION RESOLVING REMAINING APPLICATION ISSUES FOR 2018-2022 DEMAND RESPONSE PORTFOLIOS AND DECLINING TO AUTHORIZE ADDITIONAL DEMAND RESPONSE AUCTION MECHANISM PILOT SOLICITATIONS

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In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), the California Energy Storage Alliance ("CESA")[1] hereby submits these comments to the *Proposed Decision Resolving Remaining Application Issues for 2018-2022*

[1] 174 Power Global, 8minutenergy Renewables, Able Grid Energy Solutions, Advanced Microgrid Solutions, AltaGas Services, Amber Kinetics, American Honda Motor Company, Inc., Avangrid Renewables, Axiom Exergy, Boston Energy Trading & Marketing, Brenmiller Energy, Bright Energy Storage Technologies, Brookfield Renewables, Carbon Solutions Group, Centrica Business Solutions, Clean Energy Associates, Consolidated Edison Development, Inc., Customized Energy Solutions, Dimension Renewable Energy, Doosan GridTech, Eagle Crest Energy Company, East Penn Manufacturing Company, Ecoult, EDF Renewable Energy, ElectrIQ Power, eMotorWerks, Inc., Enel, Energport, ENGIE, E.ON Climate & Renewables North America, esVolta, Fluence, Form Energy, GAF, General Electric Company, Greensmith Energy, Ingersoll Rand, Innovation Core SEI, Inc. (A Sumitomo Electric Company), Iteros, Johnson Controls, KeraCel, Lendlease Energy Development, LG Chem Power, Inc., Lockheed Martin Advanced Energy Storage LLC, LS Power Development, LLC, Magnum CAES, Mercedes-Benz Energy, NantEnergy, National Grid, NEC Energy Solutions, Inc., NextEra Energy Resources, NEXTracker, NGK Insulators, Ltd., NRG Energy, Inc., Parker Hannifin Corporation, Pintail Power, Primus Power, Quidnet Energy, Range Energy Storage Systems, Recurrent Energy, Renewable Energy Systems (RES), Sempra Renewables, Sharp Electronics Corporation, SNC Lavalin, Southwest Generation, Sovereign Energy, Stem, STOREME, Inc., Sunrun, Swell Energy, Tenaska, Inc., True North Venture Partners, Viridity Energy, VRB Energy, WattTime, Wellhead Electric, and Younicos. The views expressed in these Comments are those of CESA, and do not necessarily reflect the views of all of the individual CESA member companies. (http://storagealliance.org).

Demand Response Portfolios and Declining to Authorize Additional Demand Response Auction Mechanism Pilot Solicitations ("PD"), filed by Administrative Law Judges ("ALJs") Kelly A. Hymes and Nilgun Atamturk on October 25, 2018.

I. INTRODUCTION.

CESA appreciates the Commission's leadership in pioneering new models of demand response ("DR") participation for third-party demand response providers ("DRPs") through four rounds of Demand Response Auction Mechanism ("DRAM") pilots, which serve as a future model for how DR resources are procured and delivered into the California Independent System Operator ("CAISO") market as Resource Adequacy ("RA") capacity resources. Important learning opportunities have been generated and competitive opportunities that are otherwise limited have been created through the pilots. In addition, the Commission has generally led the nation in considering how to enable multiple-use applications ("MUAs") for energy storage resources through the adoption of an MUA Framework in Decision ("D.") 18-01-003 as well as through collaborative efforts in the MUA Working Group in the Energy Storage proceeding (R.15-03-011) that culminated in an MUA Working Group Report submitted to the Commission on August 8, 2018. These collective efforts have been important to advancing how to foster a competitive landscape of DR resources, including from third-party DRPs, and to enabling the greater utilization of energy storage resources that support the grid and improve ratepayer value.

However, while supportive of these efforts, CESA is disappointed with the determinations made in the PD to: (1) decline an additional DRAM authorization; (2) decline dual participation effective immediately of Critical Peak Pricing ("CPP") customers in either the DRAM or the utility-administered DR programs; (3) adopt guidelines for a new Auto Demand Response ("ADR") Controls Policy while declining battery storage eligibility for ADR control incentives

until further notice; (4) adopt guidelines for disadvantage community ("DAC") DR proposals; (5) decline to increase the 2% reliability cap but allocate headroom under the cap to third parties; and (6) approve San Diego Gas and Electric Company's ("SDG&E") proposed price trigger for its Capacity Bidding Program ("CBP"). In particular, CESA finds the rejection of an additional DRAM authorization will sacrifice critical new learning opportunities that could have been achieved with some key changes to the DRAM program. In addition, foregoing a 2019 DRAM auction will limit market opportunities for third-party DRPs and cause the state to revert back to a past world when utility-administered DR programs were the sole opportunity for third-party DRPs to access energy and capacity markets. CESA also believes that the prohibition of CPP/DRAM dual participation contradict the MUA principles as well as the intent of developing an MUA Framework by not enabling greater utilization of DR resources.

In these comments, CESA focuses on the PD's ruling on dual participation and DRAM matters. We urge the Commission to reconsider these determinations. On dual participation issues, CESA sees a need to dive deeper into the details of the compensation, scheduling, and performance evaluation, among other issues, to build out the record and consider wholesale changes to a complex labyrinth of existing dual participation rules. To address these details, a separate MUA rulemaking is needed. In the interim, 'grandfathering' of dual participation rules prior to the adoption of this PD should be extended to other 'legacy' contracts and customers, such as for Local Capacity Requirements ("LCR") contracts negotiated and executed with an understanding of the dual participation rules at the time.

Regarding DRAM, CESA understands that the Commission has only partially completed its evaluation of the DRAM pilots (but will have it completed in December 2018) and agrees with the PD to an extent that there is a short window to consider any modifications to the DRAM that

would allow the Commission to generate new learning opportunities while keeping continued market opportunities for third-party DRPs. Despite this short time window to make DRAM modifications prior to a spring 2019 auction, CESA and its members are committed to putting in the intense time and effort to discuss and develop the needed modifications to the DRAM contracts, procurement structure, operational framework, and any other changes needed to demonstrate how DRAM resources can perform as RA resources going forward. CESA represents over 80 member companies and a large number of third-party DRPs who have indicated that they will put in the time and effort over the coming few months if the Commission were to reassess the PD's determination and begin these working group discussions to support the potential authorization of an additional DRAM pilot that would generate new learning opportunities.

II. THE COMMISSION SHOULD AUTHORIZE DUAL PARTICIPATION AROUND CRITICAL PEAK PRICING AND THE DEMAND RESPONSE AUCTION MECHANISM BY ADDRESSING THE FIREWALL REQUIREMENT.

The PD would prohibit dual participation in CPP and all other DR programs for all new customers, effective immediately and until further notice. The PD justifies this decision on the grounds that CPP enrollments are decreasing, the future of the DRAM is uncertain, few customers would be impacted, changes would require costly IT investments, and changes would increase the complexity of already complex rules.[2] CESA respectfully disagrees with the PD and believes that the decision is based on incorrect assumptions about the magnitude of affected customers and IT investment costs.

First, the numbers reported in the investor-owned utility ("IOU") and DRP responses to the June 15, 2018 Ruling may suggest that the number of customers impacted would be small,[3] but

[2] PD, pp. 13-14, 20.

[3] Responses and replies to the *Administrative Law Judges' Ruling Requesting Responses to Questions* ("Ruling"), filed on June 15, 2018.

this reported number is based on the number of customers that have actually been automatically disenrolled from CPP, which does not capture how many CPP customers have actually decided against disenrollment to enroll in a third-party DRP portfolio. The magnitude of the effect of the dual participation rules around CPP and DRAM participation is likely much larger than presented in the PD, although only anecdotal evidence is readily available at this time. In addition, the CPP has become the default rate for all non-residential customers in Southern California Edison ("SCE") territory, for example, which raises the magnitude of the effects of this dual participation barrier.

Second, as the PD noted, Pacific Gas and Electric Company ("PG&E") and SDG&E expressed a willingness and capability to eliminate the firewall requirement, which CESA views as being the chief barrier to this one dual participation use case.[4] Though the PD cited how no estimates were provided on the costs of these IT and rule changes,[5] CESA assumes that these costs would not be as significant as those past investments that have been made to enable third-party direct participation. The Commission should request cost estimates from the IOUs to understand the magnitude of the potential costs for implementing IT changes that would address this firewall requirement in order to better inform the decision to prohibit dual participation of customers under CPP and DRAM. The Commission and DR stakeholders would benefit from understanding the magnitude of these cost estimates before basing the prohibition of dual participation for this reason.

CESA continues to hold the view that CPP and DRAM customers should be allowed to dually participate and recommends that the Commission immediately begin regulatory processes, perhaps through working groups in this proceeding or through a separate rulemaking, to begin to

[4] PD, p. 18.
[5] *Ibid*, p. 19.

address these dual participation issues. With an additional DRAM on hold for the time being, the need to address this matter may be less urgent, but CESA urges the Commission to begin efforts to allow for timely implementation of new dual participation or MUA rules. The PD 'leveled' the playing field for the time being by prohibiting all dual participation of CPP customers going forward,[6] but this is a suboptimal outcome, as both third-party and utility DR customers are now denied the opportunity to provide additional value to the grid. Rather, we should be working toward enabling dual participation from all types of DR customers to enable a competitive DR marketplace while allowing customers who can provide more DR to do so.

III. A NEW AND SEPARATE RULEMAKING FOR MULTIPLE-USE APPLICATIONS SHOULD BE OPENED TO HOLISTICALLY ADDRESS DUAL PARTICIPATION ISSUES AND ALIGN WITH BROADER PRINCIPLES.

CESA is concerned that the PD contradicts the MUA principles and rules adopted in D.18-03-003 and limits the ability of energy storage resources to provide additional grid services by participating in multiple DR programs. By enabling energy storage systems to stack incremental value such as through dual participation, the Commission will be able to achieve its vision of increasing the "value of storage and potentially other forms of energy resources, and enhance its economic viability and cost-effectiveness." The same vision is shared not just by energy storage resources but also by all forms of distributed energy resources ("DERs") seeking to dual participate in DR programs.[7] In our July 20, 2018 response, CESA thus requested that the Commission consider the MUA Framework as well as the work completed in the MUA Working Group to

[6] *Ibid*, p. 21.

[7] *Joint Framework Multiple-Use Applications for Energy Storage: CPUC Rulemaking 15-03-011 and CAISO ESDER 2 Stakeholder Initiative*, p. 1. http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M206/K462/206462341.pdf

evolve the dual participation rules to address operational and incrementality concerns.[8] However, with the PD's determination on dual participation, this vision cannot be readily achieved.

Overall, the MUA issue has been addressed in siloed proceedings where rules have been separately developed to apply specifically to the proceeding at hand. The DR proceedings and applications have one set of rules, while the Integrated Distributed Energy Resources ("IDER") proceeding is governed by another set of rules (*e.g.*, D.16-12-036 and Resolution E-4889). Meanwhile, the Energy Storage proceeding (R.15-03-011) has its own set of rules established by D.18-01-003, which have permeated to some degree to other proceedings, such as the IDER proceeding's Distribution Investment Deferral Framework ("DIDF"). For example, in reviewing the dual participation guidelines between PG&E's DRAM IV *pro forma* contract and PG&E's Behind-the-Meter ("BTM") Capacity Purchase Agreement, CESA observes difference in dual participation rules. In the BTM Capacity Purchase Agreement, it appears that PG&E allows sellers to include customers who are registered in other programs or resources administered by the Commission, CAISO, or a utility provided that participation of these customers does not impact the seller's ability to perform its obligations under the agreement and complies with D.18-01-003.[9]

As an active participant in the MUA Working Group as well as the DR and IDER proceedings, it has become apparent to CESA that a separate MUA rulemaking is needed to establish MUA principles that cut across all proceedings and all types of DERs, such that siloed rules do not undercut the MUA principles established in other proceedings. With one set of MUA principles, CESA believes that the Commission will be better positioned to address MUA issues in a holistic and comprehensive manner and avoid contradicting rules and principles. CESA

[8] *Response of the California Energy Storage Alliance to the Administrative Law Judges' Ruling Requesting Responses to Questions*, filed on July 20, 2018, pp. 4-6.

[9] Consider *PG&E's 2018 Behind the Retail Meter Capacity Storage Agreement*, p. 7.

understands that the dual participation rules have been developed over the course of multiple decisions and policymaking processes. However, as the PD has acknowledged, the rules are complex and may benefit from reforms that align with broader MUA principles and potentially simplify the rules, as needed and if reasonable. CESA thus urges the Commission to begin a new MUA rulemaking to address these matters and to provide a uniform signal to DER providers around how the Commission will foster MUAs and achieve its vision.

IV. GRANDFATHERING SHOULD BE EXTENDED TO 'LEGACY' CONTRACTS THAT WERE EXECUTED AT THE TIME WHEN DUAL PARTICIPATION OF CRITICAL PEAK PRICING AND LOCAL CAPACITY REQUIREMENT CONTRACTS WERE ALLOWED.

The PD notes that there is "no evidence regarding the viability of battery storage as incremental capacity in a demand response program" in relation to the Advanced Microgrid Solutions ("AMS") Local Capacity Requirements ("LCR") contracts, adding that these issues are beyond the scope of this proceeding focused on IOU DR portfolios.[10] CESA has some concerns with the implications of this finding along with the prohibition in dual participation of all new CPP customers until further notice. Specifically, for BTM energy storage contracts under LCR contracts, this may hinder the ability of these storage providers from securing new customers to fulfill the capacity requirements of these contracts, as many of these LCR contracts are currently in the process of securing customers, some of which may be CPP customers. At the time of contract execution, there were no dual participation rules prohibiting CPP customers from dual participating in DR programs or in LCR contracts, leading these storage providers to contract for a level of capacity that could be reasonably fulfilled within the contract terms and delivery periods. If these dual participation rules were in place prior to contracting, these storage providers may

[10] PD, p. 22.

have contracted for less capacity, knowing that the eligible customer market was smaller due to the ineligibility of CPP customers.

Given that these dual participation rules appear to be temporary and were not in place at the time of contract execution, CESA requests that the PD clarify that existing LCR contracts not be subject to the dual participation prohibitions being established in this PD. As currently written, the PD may impact grid reliability and put these LCR contracts at risk of default. The Commission has a precedent in place to exempt energy storage resources from new policies or rules, such as through D.18-06-012 that clarified the Prohibited Resources Policy for DR programs. Among other things, the Commission determined that the Prohibited Resources Policy as refined in D.18-06-012 should not include requirements associated with the Self-Generation Incentive Program ("SGIP") because grid reliability could be jeopardized and contracts for DR energy storage could be found out of compliance with the Prohibited Resources Policy, resulting in the inability of those resources to contribute to DR and fulfill their contracts.[11] Similarly, an exemption for or grandfathering of already-executed LCR contracts (or other types of grid-service contracts) should be applied in regards to the new dual participation prohibition rules. Thus, grandfathering should not only be applied to DR customers who already dual participate in CPP and a utility-administered DR program (*e.g.*, CBP) but also extend such grandfathering to already-executed LCR contracts.

V. THE DECISION ON WHETHER TO AUTHORIZE AN ADDITIONAL AUCTION PILOT SHOULD BE DELAYED UNTIL A WORKING GROUP IS CONVENED TO CONSIDER REFORMS TO THE DEMAND RESPONSE AUCTION MECHANISM WITH ADDITIONAL LEARNING OBJECTIVES.

The PD declines to authorize funding for additional auctions until the DRAM evaluations has been completed (possibly by December 2018) and thereafter reviewed by the Commission. In

[11] *Decision Modifying Decision 16-09-056*, issued on June 27, 2018, p. 9. http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M217/K124/217124607.PDF

support of this determination, the PD finds that additional auction pilot results would not contribute to the final evaluation, record development for critical improvements could not be completed in time for a spring 2019 auction, and third-party opportunities (though limited) exist with IOU DR programs. Going forward, the PD lays out a process for the Commission to develop a proposal for improvements to the DRAM based on the evaluation results in Q1 2019, followed by a workshop to be held in early 2019 to discuss the results and staff recommendations and leading to a final decision on DRAM's future in mid-2019.

Understandably, the Commission should consider whether additional ratepayer dollars would be prudently spent on an additional auction pilot after four rounds of the DRAM have already been held. Especially since the evaluation is nearing completion, CESA agrees that an additional DRAM that does not enhance the final evaluation would be an imprudent use of ratepayer funds and agrees that a determination on whether DRAM should be a permanent mechanism may be premature at this time.[12] However, CESA and other parties have recommended several changes to the DRAM that could be implemented to advance further learnings on how DRAM resources could perform to meet real-world obligations and conditions that had not previously been tested due to the pilot status of the DRAM. Offline, for example, CESA has worked with members and other parties to develop ideas and proposals to modify the DRAM contract to incentivize DRAM participants to establish monthly demonstrated capacity, create structures to subject DRAM resources to the RA Availability Incentive Mechanism ("RAAIM"), and potentially revise performance assurance collaterals and securities. CESA is prepared to bring these ideas into a public regulatory forum and collaborate with the IOUs and other parties to develop key learning objectives and consider key modifications to the DRAM contract and

[12] PD, pp. 76-77.

structure to provide merit to conducting an additional auction. With learning objectives around how DRAM resources can meet real-world obligations and conditions, CESA believes there are learnings that are incremental to that of the final evaluation report being prepared by the Commission, and thus the issue whether this additional data could be included in the evaluation report is less important.

Despite these potential improvement ideas, CESA agrees that the window to introduce, consider, and refine many of these improvements will likely require significant time, which may make it difficult to complete the modifications in time for a spring 2019 auction, as the PD notes.[13] However, many parties have been meeting informally and have been working to flush out these improvement ideas, which may save time in this collaborative and record development process. Instead of declining an additional DRAM authorization at this time, CESA recommends that the Commission direct an immediate working group process to allow stakeholders to work through the details and then see if the identified improvements could be agreed upon and implemented in time for a spring 2019 auction. There still is time to do so, and CESA is open to hearing feedback from the IOUs and other stakeholders on the feasibility and reasonableness of the proposed modifications. Following this working group process, the Commission can then determine whether to authorize an additional DRAM auction, which may depend on whether stakeholders come to a consensus on key modifications in time and whether the proposed modifications would sufficiently test the viability of DRAM resources as RA resources. The PD currently does not direct specific actions following the publication of the DRAM pilot evaluation, so CESA recommends the PD be modified to direct immediate action following the publication to allow for timely consideration and potential implementation of a new DRAM auction.

[13] *Ibid*, p. 78.

Finally, an additional reason to delay the determination around an additional DRAM authorization is that the DRAM represents one of the few third-party DRP opportunities in California. The PD recognizes that there are limited DR opportunities for third-party DRPs, but CESA is concerned that the PD assumes that "market continuity" is assured for third-party DRPs through utility-administered DR programs. Much of the DRAM resources will likely need to move their capacity back to utility-administered DR programs, moving the state's DR resources to the 'old model' for DR programs.[14] For similar reasons around the lack of non-DRAM options for third-party DRPs, previous rounds of the DRAM were approved.[15] Furthermore, CESA also notes that Order No. 841 from the Federal Energy Regulatory Commission ("FERC") also intended to ensure that DERs are not unreasonably prohibited from participating in the market. Unlike other regions of the country where regional transmission operators ("RTOs") and independent system operators ("ISOs") run organized wholesale capacity markets, third-party DRPs in California do not have access to those markets other than through the DRAM program. With DRAM as the primary pathway for DERs to provide RA into the market, third-party DRPs in California are limited in market participation pathways.

CESA thus urges the Commission to reassess the determination made in this PD to not authorize an additional DRAM auction. At this time, CESA recommends that a working group

[14] See also *Comments of the California Energy Storage Alliance to the Administrative Law Judge's Ruling Directing Responses to Questions Regarding the Demand Response Auction Mechanism Pilot*, filed on August 17, 2018, pp. 3-5.

[15] See D.17-10-017 Findings of Fact 25: "Utility programs that remain available to demand response aggregators have not been shown as resulting in an overall growth of business opportunities for third party demand response providers in 2019."

Findings of Fact 28: "Business opportunities for growth in third party-provided demand response in 2019 have been limited."

Conclusions of Law 15: "It is reasonable to conduct an additional auction to support the market for competitive demand response during 2018 while the Commission makes a policy determination of whether to adopt a demand response auction as a permanent procurement mechanism."

process be immediately initiated to allow for stakeholders to consider some of the key improvement ideas developed by CESA and other parties. If feasible, reasonable, and timely, the key modifications could potentially be implemented in a new DRAM in the spring of 2019 and advance additional learning opportunities that would then later support the Commission's evaluation on whether the DRAM should be a permanent mechanism. CESA is not advocating for a definitive additional DRAM authorization at this time and is instead asking for some further consideration on whether an additional DRAM authorization could be beneficial with some key modifications. If the timing is infeasible to launch a spring 2019 auction, then the Commission could move to consider whether a 2020 auction can be authorized with the modifications considered in the 2019 workshop and working group process.

VI. ENERGY STORAGE SYSTEMS SHOULD BE ELIGIBLE FOR AUTOMATED DEMAND RESPONSE CONTROL INCENTIVES AND THE STAKEHOLDER PROCESS IS REASONABLE.

The PD adopts a set of policies to be included in the revised ADR Control Incentives Guidelines, decides to have ADR incentives be a contract term for DR resources procured outside of the IOU portfolio, and adopts a stakeholder process to pursue further technical refinements to the adopted guidelines as it pertains to battery storage systems, among other things. CESA generally supports the PD's determinations on these matters. CESA finds it reasonable to have ADR controls be negotiated as a contract term that is negotiated between the seller and the utility going forward.[16] While CESA believes that energy storage systems should be eligible for ADR incentives, we recognize that the Commission needs to build out the record on how to approve guidelines in relation to energy storage systems and we expect to be an active participant in the stakeholder process. In general, ADR control incentives should be allowed for energy storage

[16] PD, pp. 47, 58-59.

systems and structures and processes should be established to ensure that control incentives are demonstrated to be separate and incremental from incentives or payments for other hardware costs.

VII. GIVEN THE LIMITED THIRD-PARTY DEMAND RESPONSE OPPORTUNITIES, IT IS PRUDENT TO ALLOCATE THE REMAINING CAPACITY UNDER THE RELIABILITY CAP TO THIRD-PARTY RESOURCES.

The PD proposes to allocate the remaining megawatts under the 2% reliability cap to third-party DR providers, given the small share of third parties providing DR under the Base Interruptible Program ("BIP").[17] CESA agrees and adds that the limited third-party DRP opportunities with the proposed decision to not authorize an additional DRAM auction makes it reasonable to do so as well. As noted before, third-party DRPs have very limited opportunities as is, and this determination will at least provide additional opportunities for them to provide DR.

VIII. CONCLUSION.

CESA appreciates the opportunity to submit these comments to the PD and looks forward to working with the Commission and stakeholders in this proceeding.

Respectfully submitted,

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[17] PD, pp. 33-34.