

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



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Order Instituting Rulemaking Regarding Policies and  
Protocols for Demand Response Load Impact Estimates,  
Cost-Effectiveness Methodologies, Megawatt Goals and  
Alignment with California Independent System Operator  
Market Design Protocols.

Rulemaking 07-01-041  
(Filed January 25, 2007)

**COMMENTS OF ENERNOC, INC., ENERGYCONNECT, INC.,  
AND COMVERGE, INC. ("JOINT PARTIES") ON THE PROPOSED DECISION  
OF ALJ HECHT ADOPTING A DR COST-EFFECTIVENESS METHODOLOGY**

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OF THE STATE OF CALIFORNIA

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OF ALJ HECHT ADOPTING A DR COST-EFFECTIVENESS METHODOLOGY**

EnerNOC, Inc., Energy Connect, Inc., and Comverge, Inc. (“Joint Parties”) respectfully submit these comments on the Proposed Decision of Administrative Law Judge (ALJ) Hecht Adopting a Method for Estimating the Cost-Effectiveness (C-E) of Demand Response (DR) Activities mailed in Rulemaking (R.) 07-01-041 (Demand Response (DR)) on October 18, 2010 (“Proposed Decision”). These comments are filed and served pursuant to Article 14 of the Commission’s Rules of Practice and Procedure and the instructions accompanying the Proposed Decision, including the 5 day extension on the time allowed for filing opening comments.

**I.  
INTRODUCTION**

Each of the Joint Parties provides DR services under contract to the three investor-owned utilities (IOUs). For this reason, the Joint Parties have taken an active part in the development of a DR C-E methodology since the inception of this rulemaking in 2007 and most recently participated in the Commission’s DR C-E Workshop held on November 2, 2010 (November 2 Workshop). As a result, resolution of this phase of R.07-01-041 is likely to have a significant impact on the Joint Parties’ current and future DR offerings to utility customers.

The Joint Parties, therefore, commend ALJ Hecht for issuing a Proposed Decision that adopts appropriate C-E protocols and policies that will ensure the fair and transparent evaluation

of DR programs. The Joint Parties are strongly supportive of the Proposed Decision if certain modifications, as identified herein, are made to Attachment 1, the Proposed Decision's adopted C-E methodology and protocols. With those changes, the Commission should adopt the Proposed Decision, as modified.

**II.**  
**THE JOINT PARTIES ARE LARGELY SUPPORTIVE OF THE**  
**PROPOSED DECISION'S ADOPTED**  
**DR COST-EFFECTIVENESS METHODOLOGY AND PROTOCOLS**

The Joint Parties are largely supportive of the Proposed Decision and would urge adoption by the Commission, with the modifications identified in Section III herein. The Proposed Decision has adopted several of the proposals that were articulated by the Joint Parties throughout this phase of R.07-01-041. In addition, the Proposed Decision has adopted foundational principles to provide consistency and transparency by reducing the use of confidential information in the calculation of C-E for all three utilities. Consistency and transparency are important to instill confidence in the methodology and the results. After all, the results of the C-E methodology will determine which DR programs will continue to be supported by the Commission and the utilities and which DR programs will not.

In addition to supporting the Proposed Decision's principles of consistency and transparency, the Joint Parties also support the Proposed Decision's inclusion of avoided transmission and distribution upgrades or investments as a result of reduced demand as a benefit in the C-E methodology.<sup>1</sup> The Joint Parties believe that it is important to include transmission and/or distribution savings to the extent that DR relieves congestion and/or defers investment in system upgrades. The Joint Parties are aware that DR events can be called not only for high demand or high energy prices as a generation alternative, but also as a substitute for

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<sup>1</sup> Proposed Decision, at pp. 31-32.

distribution/transmission investments or when the utility is experiencing transmission or distribution outages, the result of which could be to overload remaining T&D lines.

The Joint Parties further support the Proposed Decision's inclusion of scenario analysis in the C-E methodology.<sup>2</sup> In particular, the Joint Parties support the inclusion of a customer benefit as part of the scenario analysis.<sup>3</sup> Because customers are not likely to be incentivized to participate as a DR resource if their only prospect is to break-even, or merely recover the costs to participate, the Joint Parties feel strongly that is important to include a customer incentive in the C-E methodology. This result is consistent with how business owners will evaluate whether to become a DR resource or continue with business as usual.

It is also appropriate to include overheads and marketing costs as part of the overall costs of the programs. This outcome is the same as it would be for any program for which promotion and support is provided by the utility.<sup>4</sup>

Finally, revenues received from the California Independent System Operator (CAISO) for direct participation of DR resources in CAISO's programs, either as a Proxy Demand Resource (PDR) or as a Reliability Demand Response Produce (RDRP), are also appropriately recorded by the Proposed Decision as benefits of DR.<sup>5</sup> However, the Joint Parties would caution the Commission against including the lost retail revenues of the utilities resulting from direct participation in CAISO as a cost at this time. In the Direct Participation Phase of this proceeding, the question of whether to include recovery of lost retail revenues and the method for calculating such lost revenues is a pending issue. Therefore, it would be premature to give recognition of lost retail revenues as a cost item at this juncture.

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<sup>2</sup> Proposed Decision, at pp. 19-20.

<sup>3</sup> Proposed Decision, at pp. 33.

<sup>4</sup> Proposed Decision, at pp. 18-19.

<sup>5</sup> Proposed Decision, at pp. 33-34.

**III.**  
**WITH MODIFICATIONS TO CLARIFY OR CORRECT CERTAIN  
ASSUMPTIONS, CALCULATIONS, AND STATEMENTS, THE  
PROPOSED DECISION SHOULD BE ADOPTED BY THE COMMISSION.**

The Joint Parties clearly find the Proposed Decision well-reasoned. However, before it is adopted by the Commission, the Joint Parties recommend that the following modifications, corrections, and clarifications be made.

**A. Finding of Fact 5 Must Be Modified.**

Finding of Fact 5 states that avoided electricity costs are the most significant benefit of demand response.<sup>6</sup> The Joint Parties agree. However, Finding of Fact 5 should be modified to conform with the discussion of avoided costs to clarify that electricity costs include both energy and capacity costs.

The Joint Parties, therefore, propose the following modification to Finding of Fact 5, with the added language shown in bold:

Finding of Fact 5. [p. 38] Avoided electricity costs, **which include both energy and capacity costs**, are the most significant benefit of demand response.

**B. The Adopted CE Methodology Should be The Rule, Not the Exception.**

At the November 2 Workshop, there was discussion as to which DR programs the C-E methodology would apply. While the Joint Parties do not have any specific recommendations at this time, on a principled basis, the validity of the methodology should not be undermined by excluding any program without good reason. If too many programs are exempted from being evaluated under the C-E methodology, then programs that *are* evaluated become the exception rather than the rule. Joint Parties agree that pilot programs may be exempted from the Commission-approved C-E methodology. Pilot programs, by definition, are not permanent

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<sup>6</sup> Proposed Decision, Finding of Fact 5, at p. 38.

programs, have very limited participation, are not included in the load impact protocols, and are experimental in nature.

**C. TA/TI Costs Should Not be Included in the CE Methodology or Evaluation.**

Another subject of discussion at the November 2 Workshop was whether technical assistance/technical incentive (TA/TI) costs should be included as a cost of the DR Programs in the C-E Methodology. The Joint Parties submit that they should not.

TA/TI is intended to encourage customer participation in nascent DR programs and, as set out in the last 3-Year DR Program Plans, to encourage participation in automated DR (Auto-DR). TA/TI is not intended to be a permanent incentive. Further, TA/TI is elective. While there may be a budget established for TA/TI, not all customers will either take advantage of TA/TI incentives or be eligible to receive them. Further, TA/TI customer participation can vary significantly from one DR program to another. For all of the above-stated reasons, Joint Parties do not believe that TA/TI should be included as a cost of DR Programs.

**D. The Assumed Capacity Factor for Combustion Turbines is Too High.**

The proposed methodology for calculating avoided generation capacity costs that is outlined beginning on page 21 of Attachment 1 of the Proposed Decision (2010 Demand Response Cost Effectiveness Protocols) has several obvious flaws. Specifically, the 11.3% capacity factor shown in cell F16 of the Inputs tab of the DR Reporting Template<sup>7</sup> equates to approximately 1,000 hours of operation per year,<sup>8</sup> assuming the CT runs at full output when it is operating. This seems to be optimistic compared with data available from two other sources.

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<sup>7</sup> The link for the DR Reporting Template was provided in the Proposed Decision, at n. 10, p. 11.

<sup>8</sup> 11.3 percent of 8760 is actually 990 hours per year, rounded for arithmetic simplicity.

First, as shown in the analysis on page 2.25 of the CAISO's 2009 Annual Report on Market Issues and Performance (CAISO 2009 Annual Market Report),<sup>9</sup> the CAISO expected a new CT to operate at around a 6% capacity factor in 2009. Second, in its more recent analysis of the impacts of 20% renewable penetration,<sup>10</sup> the CAISO states:

“The combination of increased production of wind and solar energy will lead to displacement of energy from thermal (gas-fired) generation in both the daily off-peak and on-peak hours. Due to this displacement and to simultaneous reduction in market clearing prices, there may be significant reductions in energy market revenues to thermal generation across the operating day in all seasons.”

It is more reasonable to assume that a new CT would operate at a capacity factor of 6% instead of the 11.3% value used in the Reporting Template. Attachment 1 of the Proposed Decision should be modified to reflect this assumption.

#### **E. The Energy Market Revenues That Could be Earned by a New CT Are Overstated.**

The \$122.19 value for levelized energy market revenues shown in cell F25 of the DR Reporting Template equates to an average energy market price of approximately \$122/MWh for the 1,000 hours when a new CT is assumed to operate. This assumption appears to be unrealistically optimistic on several grounds.

First, at an assumed price for natural gas of approximately \$6/MMBTU,<sup>11</sup> a \$122/MWh average market price implies the marginal resource in each of the 1,000 hours a new CT is expected to operate has a heat rate of around 20,000 MMBTU per kWh,<sup>12</sup> if all resources bid their marginal cost. If this did in fact occur, one would expect a new CT to operate for more than 1,000 hours per year; yet as noted above, two CAISO analyses suggest the opposite is likely to be true.

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<sup>9</sup> <http://www.aiso.com/2777/27778a322d0f0.pdf>, Figure E.3

<sup>10</sup> Integration of Renewable Resources - Operational Requirements and Generation Fleet Capability At 20% RPS, <http://www.aiso.com/2804/2804d036401f0.pdf>, at p. v.

<sup>11</sup> The figure is based \$60.56 operating cost less \$4.17 variable O&M cost, divided by a 9300 BTU/kWh heat rate.

<sup>12</sup> The heat rate stated is based upon \$122/MWh divided by \$6/MMBTU.

Second, going forward, a combination of low demand growth, increased penetration of renewable resources, and new gas-fired resource additions suggests that CAISO energy market prices are likely to decline further from already depressed 2009 levels.<sup>13</sup> Such a circumstance would further reduce the energy margins that could be earned by a new CT.

Third, 2009 represents the first year of operation for MRTU. During that period, real-time price spikes in many hours were linked to software and modeling anomalies.<sup>14</sup> Joint Parties suggest that 2008 prices, corrected for changes in the price of natural gas, would be a better basis for calculating market revenues.

#### **IV. CONCLUSION**

The Joint Parties recommend that the Commission adopt the Proposed Decision, with the modifications to the Proposed Decision and Attachment 1 identified herein. With those changes, the Proposed Decision will offer a sound approach to evaluating the cost-effectiveness of DR programs and measures.

November 12, 2010

Respectfully submitted,

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<sup>13</sup> See, n. 2, *supra*.

<sup>14</sup> At page 3.19, the CAISO Annual Report on Market Issues and Performance states:

“During the first two months of the new market, a relatively high number of extreme price spikes occurred (i.e., in excess of the \$500 bid cap). The frequency of these extreme price spikes decreased significantly in June and July. Starting in August, the frequency of price spikes remained relatively low and an increasing portion of price spikes were within a much lower range of \$250 to \$500/MWh. The lower frequency and more moderate levels of price spikes in the second half of 2009 can be attributed to a number of software and modeling improvements made to avoid extreme price spikes that were not reflective of actual real-time constraints and supply/demand conditions.”

**CERTIFICATE OF SERVICE**

I, Sara Steck Myers, am over the age of 18 years and employed in the City and County of San Francisco. My business address is 122 - 28<sup>th</sup> Avenue, San Francisco, California 94121.

On November 12, 2010, I served the within document **COMMENTS OF ENERNOC, INC., ENERGY CONNECT, INC., AND COMVERGE, INC. (“JOINT PARTIES”) ON THE PROPOSED DECISION OF ALJ HECHT ADOPTING A DR COST-EFFECTIVENESS METHODOLOGY** in R.07-01-041 (DR), with service on the R.07-01-041 service list in the manner prescribed by the Commission’s Rules of Practice and Procedure and with additional and separate electronic service and hard copy delivery of these comments by U.S. Mail to Assigned Commissioner Grueneich and Assigned ALJs Hecht, Sullivan, and Farrar at San Francisco, California.

Executed on November 12, 2010, at San Francisco, California.

/s/ SARA STECK MYERS  
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November 12, 2010**

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