

Rulemaking No.: 13-09-011 (DR)

Exhibit No.: JDRP-1-Errata

Witness Mona Tierney-Lloyd

Commissioner Michael Peevey

ALJ Kelly Hymes

**ERRATA TO PHASE TWO AND PHASE THREE
OPENING PREPARED TESTIMONY OF
JOINT DEMAND RESPONSE PARTIES
(EnerNOC, Inc., Comverge, Inc. & Johnson Controls, Inc.)**

Rulemaking 13-09-011
Demand Response (DR)
Phases Two (Foundational Issues) & Three (Future DR Program Design)

May 19, 2014

R.13-09-011 (DR)
PHASE TWO AND PHASE THREE
ERRATA TO OPENING PREPARED TESTIMONY OF
JOINT DR PARTIES

Witness: Mona Tierney-Lloyd

Page	Line(s)	Errata (Redlined in Replacement Page)
26	8, 17-23, 31-32	Replacement Page (26) attached. ¹

¹ Deletions are shown in strike-through; additions are shown in bold type.

R13-09-011 (DR)(Phases 2 & 3)

Errata to Joint DR Parties Opening Prepared Testimony

ERRATA

May 19, 2014

REPLACEMENT PAGE

1 being proposed in the RSI would require DR resources to submit day-ahead and
2 real-time energy bids on non-holiday weekdays during the peak hours of 2-6 PM
3 from April to October² and 5-9 PM in all other months. These resources must
4 also be available for at least 5 days per month. Through the RSI process, self-
5 schedules are permitted; for FRACMOO, self-schedules are not permitted.

6 **Q.B.11.Do DR resources count toward the LSEs local capacity requirement**
7 **(LCR)?**

8 A.B.11.Yes. Today, dispatchable DR resources, that are capable of being dispatched on
9 a local basis count toward local RA. However, the ability for DR resources to
10 meet local capacity requirements (LCR) has been the subject of debate within
11 the 2012 LTPP. CAISO was reluctant to count DR resources for local reliability
12 needs for several reasons:

- 13 (1) The location of the resource within an LCA was not clear,
- 14 (2) The resource could not be dispatched in time to allow the CAISO to
15 stabilize the system after a contingency event;
- 16 (3) The resources availability to the CAISO was limited.

17 Decision (D.) 13-02-015) directed ~~CAISO and SCE to work together to develop a~~
18 ~~definition for DR to qualify as a local capacity resource~~ **with CAISO to develop**
19 **performance characteristics for local reliability and assess the impact of**
20 **preferred resources to meet or reduce LCR needs.** ~~CAISO and SCE to work~~
21 ~~together to develop a definition for DR to qualify as a local capacity resource.~~
22 **That A definition of local reliability characteristics for DR** has been proposed
23 as part of the **CAISO's 2013/14 Transmission Planning Process (TPP)**, but
24 has not been fully explored and has not been adopted by the CPUC. Therefore,
25 the issue around DR qualifying as a LCR is being examined in the RSI, but is
26 uncertain and in flux.

27 In the most recent aggregator-managed portfolio (AMP) contracts, which resulted
28 from D.12-04-045, the DR resources were directed to be locally dispatchable if
29 they were going to count for local RA. The IOUs and the DR Aggregators went
30 to great effort to ensure local delivery for resources beginning in 2013. However,
31 as stated previously, ~~that~~ ~~these~~ ability may not fully satisfy CAISO's criteria for DR
32 resources to satisfy the LCR.

² Of note, the Commission requires RA resources to be available from 1-6 PM during April-
October. See, D.10-06-034, at p. 44.