

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding
Policies, Procedures, and Rules for
Development of Distribution Resources
Plans Pursuant to Public Utilities Code
Section 769

Rulemaking 14-08-013
(Filed August 14, 2014)

**COMMENTS OF TENDRIL
ON ORDER INSTITUTING RULEMAKING**

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September 5, 2014

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Consistent with the *Order Instituting Rulemaking* issued on August 14, 2014, Tendril respectfully submit the following comments. We are eager to be a part of the deliberations in this proceeding and hope that our experience developing solutions for consumer engagement will offer a meaningful contribution to the record developed.

I. INTRODUCTION

Tendril is pleased to submit these comments in regard to the *Order Instituting Rulemaking*. Tendril is a pioneer in the energy management market, offering a cloud-based software platform that provides the infrastructure, analytics and understanding required to deliver personalized energy services and drive new business opportunities.

Tendril strongly supports the overall objective established by AB 327 and furthered by the Commission in this proceeding to identify the “optimal location for the deployment of DERs, and [the] specific locational values for DERs.” Further, we acknowledge the Commission’s recognition that DERs can provide an important contribution in terms of environmental benefits.

We are encouraged by the discussions in this proceeding and look forward to further opportunities to participate in this important discussion.

II. GENERAL REMARKS

We encourage the Commission to continue to embrace a consumer-centric approach to developing Distribution Resource Plans. In particular, it is our experience that companies with innovative software, services and products find their development is constrained by the requirements of prescriptive utility programs for energy efficiency, demand response and consumer engagement. We believe that the Commission should continue to emphasize a market structure that encourages (1) a focus on the consumer and (2) a focus on specific energy efficiency and system operations outcomes (as distinct from program design).

This consumer-centric approach may yield significant advantages when considering the develop of DER in the specific locational context contemplated in this proceeding and established by AB 327. For example, with regard to energy efficiency, a traditional approach in the utility industry is to design programs and implement specific measures that can be demonstrated to deliver energy reductions. While this approach is successful and reliable, it does little to provide the flexibility to leverage the best available technologies in a fast-changing marketplace. As a result, for example, utilities may be constrained in their ability to benefit from software and product innovations and may leave energy efficiency opportunities unrealized.

As part of the guidance that will be developed within this proceeding, we believe it is critical that the characteristics of the consumer base are considered simultaneous with the physical assets, DER and operating characteristics of the distribution grid. Therefore, we encourage the Commission to include and make available to market

participants information about the consumers in each location in a format that allows appropriate demographic and behavioral analysis.

III. CONCLUSION

The consumer is a distinctly important factor when determining the current and future DER potential across the distribution system. In order to fully assess the locational and temporal DER potential and, therefore, value, it is imperative that consumer information is considered and made available in a consistent, usable format.

Thank you for the opportunity to offer these comments and we look forward to being part of the discussion going forward.

September 5, 2014 in Boulder, Colorado.

Respectfully Submitted,

/s/ Marie Bahl

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