



OhmConnect

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Load Impact Protocol Simplification Proposal

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Background



Proposal Overview



LIP Simplification Proposal by Section

- D.21-06-029 (Rulemaking 19-09-001) requested that CEC working group develop recommendations for DR QC methodology
- Final report of supply side DR working group published January 2023
- D.23-06-029 authorized Energy Division (ED) to pursue simplification of the current LIP requirements to develop a proposal for Commission consideration (pp. 81 and 134)
- Concurrent to ED-led working group efforts to refine incentive-based supply-side DR QC methodology

Proposal Overview

- This proposal is intended as an initial set of options
 - OhmConnect is open to modifications to achieve a proposal with broad support
 - Edits were made for clarification and to incorporate suggestions made during the workshop
- This proposal is focused on streamlining the LIP process to reduce cost and time of informing ED efforts to determine DR RA QC values only
- Some protocols, while completely unnecessary for RA, may still be useful for long-term planning and other purposes
- Compatible with the slice-of-day RA program
- Organized by Group and Protocol

Evaluation Plan

Protocols 1, 2, 3

Protocol	Protocol Description	Proposed Disposition
1	Evaluation plan is required	Replace narrative with standardized questions to simplify review and DRP-DRP comparisons
2	Evaluation plan must delineate the purpose of the evaluation	Eliminate b/c evaluation is only for DR QC valuation
3	Issues/elements to be addressed in evaluation plan	Mandatory only for first time filers or those with material program changes

Ex post for event-based DR

Protocols 4, 5, 6, 7, 8, 9, 10

Ex post evaluation for event-based DR

Protocol	Protocol Description	Proposed Disposition
4	Impact estimates must be provided for each hour for each specified day type	Keep; revise to be consistent with slice of day requirements
5	Change in avg. mean energy use for the year must also be estimated	Eliminate; not necessary for monthly QC and not informative for seasonal resources
6	Uncertainty adjusted impacts must be provided for at least the 10th, 30th, 50th, 70th, and 90th percentiles	Eliminate
7	Load impact estimates must be reported in specific tabular format	Keep; revise to be consistent with slice of day requirements
8	Impact estimates must be provided for each event day and for an average event day over a year	Eliminate avg. event day over a year; not useful b/c QC values are monthly; keep at individual event or representative monthly roll-up for large no. of events
9	List the statistical tests and measures that must be reported if day matching methods are used	Keep
10	List the statistical tests and measures that must be reported for regression methods	Keep

Ex post for non-event-based DR

Protocols 11, 12, 13, 14, 15, 16

Ex post for non-event-based DR

Protocol	Protocol Description	Proposed Disposition
11	Hour of day and daily impact estimates	Eliminate unless non-event-based DR counted for QC
12	Average and total impact	Eliminate unless non-event-based DR counted for QC
13	Percentile-based uncertainties	Eliminate unless non-event-based DR counted for QC
14	Tabular output format	Eliminate unless non-event-based DR counted for QC
15	Reporting requirements	Eliminate unless non-event-based DR counted for QC
16	Error metrics for regression results	Eliminate unless non-event-based DR counted for QC

Ex ante

Protocols 17, 18, 19, 20, 21, 22, 23

Protocol	Protocol Description	Proposed Disposition
17	Base ex ante estimates on ex post evaluation	Keep
18	Impact estimates must be provided for each hour for each day type	Keep; revise to be consistent with slice of day requirements
19	Change in avg. mean energy use for each month and year	Eliminate; not necessary for QC and not informative for seasonal resources
20	Uncertainty adjusted impacts must be provided for at least the 10th, 30th, 50th, 70th, and 90th percentiles	Eliminate
21	Load impact estimates must be reported in specific tabular format	Keep; revise to be consistent with slice of day requirements
22	Impact estimates must be provided for a typical event day for event based resources	Keep; revise to be consistent with slice of day requirements
23	Statistical tests and measures that must be reported for regression methods used for impact estimation	Keep

Miscellaneous Technical

Protocols 24, 25

Miscellaneous technical

Protocol	Protocol Description	Proposed Disposition
24	Portfolio-level adjustments	Not required if no dual participating customers
25	Sampling guidelines to minimize bias	If applicable

Evaluation Report

Protocol 26

Protocol	Protocol Description	Proposed Disposition
26	Evaluation report requirements	Keep as optional
	Study methodology	Keep
	Validity assessment	Keep
	Detailed study findings	Inclusion of prior years' ex ante analyses is optional

Process and public review

Protocol 27

Process and public review

Protocol	Protocol Description	Proposed Disposition
27	Process and public review	Shorten process; limit review of draft evaluation plan and draft evaluation report to Energy Division, CEC Staff, PAO, and CAISO; eliminate LIP workshop for third-party DR providers

- Current timeline is unworkable b/c it forces DRPs to sell capacity before knowing the value of that capacity; this creates unnecessary risk and uncertainty for the DRP and contracting LSE
- The public review period should be eliminated b/c DRPs engage in various degrees of redaction of draft evaluations; also, IOU review constitutes a conflict of interest; propose to reduce review period and limit to Energy Division, CEC Staff, Public Advocates Office, and CAISO
- QC determination must be transparent so DRPs can make adjustments from one year to the next; any derates from ex ante impacts should include explanations
- Confidentiality: the customer forecast rationale is not for public consumption as it contains market sensitive information (other DR providers may have different redaction preferences)

Process and public review

Deliverable	Current Deadline	Proposed Deadline
Evaluation Plan	December 31	January 15
>>Comments on evaluation plan	January 15	January 25
Draft evaluation report	March 11	March 15
>>Comments on draft report	March 25	March 30
Final evaluation report	April 1	April 20
LIP Workshop	mid-May	n/a
QC Values Assigned	mid-Sep	July 1

Summary

LIPs can be streamlined by requiring only the information that is necessary to award qualifying capacity, saving time and money for both preparers and reviewers

Helpful Links

[OhmConnect Simplified LIPs Proposal](#)

Prepared for California Energy Commission DR QC Working Group
Filed September 26, 2022

[Qualifying Capacity of Supply Side Demand Response Working Group Final Report](#)

Lyon, Erik, Tom Flynn, and Daniel Hills-Bunnell. 2022. *Qualifying Capacity of Supply-Side Demand Response Working Group Draft Final Report*. California Energy Commission. Publication Number: CEC-200-2022-001-F