

Rulemaking No.: 20-11-003

Exhibit No. Recurve-02

Witnesses Carmen Best

Commissioner Marybel Batjer

ALJ Brian Stevens

REPLY PREPARED TESTIMONY OF RECURVE ANALYTICS, INC.

Rulemaking 20-11-003

Extreme Weather Event Reliable Electric Service

September 10, 2021

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

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5 **REPLY TESTIMONY OF RECURVE ANALYTICS, INC IN RESPONSE TO ALJ**
6 **STEVENS EMAIL RULING OF AUGUST 16, 2021 REGARDING STAFF**
7 **CONCEPT PROPOSALS FOR SUMMER 2022 AND 2023 RELIABILITY**
8 **ENHANCEMENTS**

9 **I. Introduction**

10 Recurve's reply comments are focused on topical areas where we see significant agreement
11 with parties on core themes from our opening comments.

12 **II. Reply Testimony**

13 **A. Support For MCE's Funding Request to Expand Peak FlexMarket**

14 Recurve supports MCE's funding request to expand their Peak FlexMarket with the remaining
15 budget in unrequested energy efficiency funds (see description on page 1-3 of MCE opening
16 testimony). Recurve fully supports MCE's budget proposal to use unrequested funds to
17 expand the Peak FlexMarket in response to the emergency. Having established the market in
18 2021, MCE is poised to deliver on its expected MW. As the only Community Choice
19 Aggregator that has applied to administer energy efficiency programs, it is already preparing
20 for upcoming planning exercises, and is investing in significant long-term load modifying
21 resources with the Commercial FlexMarket.

22 **B. Support for Peninsula Clean Energy's Additional Concept "Commercial Load**
23 **Evening Peak Reduction"**

24 Recurve supports Peninsula Clean Energy's "additional concept" of the Commercial Load
25 Evening Peak Reduction program (see page 18-19) and expects that a Peak FLEXMarket
26 access model akin to that implemented by MCE could be a good fit for implementation.
27 Funding could be allocated via our recommended streamlined pathway to access energy
28 efficiency ratepayer funds.

1 We also wish to clarify our request to streamline access for other CCAs to implement a
2 market access model. CCAs that elect to administer energy efficiency budgets should be
3 granted a simplified advice letter format to access funds to implement a FlexMarket (inclusive
4 of both energy efficiency and demand response) in response to the emergency. The current
5 rules for electing to administer are quite complicated. We recommend that if a CCA is
6 proposing to implement a model like MCE's Flex Market, which has already been vetted via
7 public processes for the energy efficiency proceeding, they should be allowed to access funds
8 to launch immediately via a simplified advice letter describing the market access model (to
9 ensure it meets criteria outlined in our proposal) and the funding requested.

10 **C. Support SCE's Request to Expand Phase II VPP Pilot and to Incorporate P4P**

11 Recurve supports SCE's request to extend the Phase II VPP Pilot (see page 30 of SCE direct
12 testimony) and strongly encourages the adoption of a pay-for-performance model utilizing
13 population normalized metered energy consumption. As described in our opening comments,
14 a market access model, like FlexMarket, maybe a good fit to open this pilot to a technology-
15 agnostic solution for bringing resources forward in 2022 and 2023.

16 **D. Support EV.Energy Request to Allow Counterfactual Analysis for EV Charging**

17 Recurve supports EV.Energy's request to utilize counterfactual analysis for analyzing EV
18 charging practices rather than relying solely on EVSE for performance assessment. However,
19 we note that CalTRACK methods rely on historic usage data as the basis of counterfactual
20 baselines. We agree with EV.Energy's position that a technology-agnostic approach to
21 measuring performance benefits from making full use of the hardware already deployed in
22 California (AMI) and expands participation (both of participants and vendors in the market).

23 **E. Support Ohm Connect Proposal for Additional Payment for Low-Income Customers**
24 **& Seamless Transition Between Programs**

25 Recurve supports the OhmConnect proposal to provide additional payments for CARE and
26 DAC participants in any final residential ELRP solution (see pages 7-8 of Ohm Connect
27 Direct Testimony). We also support their request for a seamless transition between DR
28 programs (see page 5 of Ohm Connect Direct Testimony). We agree that the existing
29 processes for a customer to enroll and disenroll from DR programs represent another example
30 of broader data exchange issues that are hobbling clean energy.

1 **F. Support SunRun and SCE on Allowing Dual Participation**

2 Recurve supports SunRun's request to allow for dual enrollment with ELRP given there is no
3 capacity payment for ELRP. We agree with their statement that "*Dual enrollment in programs*
4 *provides an overall benefit to the grid and ratepayers, as there is benefit to gaining*
5 *incremental capacity and energy from customers who are already participating in programs.*"
6 (p.19 SunRun Direct Testimony) We also agree with SCE's position that "*Current rules that*
7 *force customers to decide between technology to participate in a DR program result in*
8 *stranded load reduction potential in the devices not utilized and standing idle in times of*
9 *need.*"(p. 9 SCE Direct Testimony)

10 **G. Support Voltus Position on Simplifying Markets and CCA Innovation**

11 Recurve strongly supports Voltus' sentiment that "*incentives and base payments provide more*
12 *emergency reliability, more cost-effectively, than do penalties and rate-payer funded*
13 *administrative oversight.*" (see page 2 of Voltus Direct Testimony) We also agree with Voltus
14 that CCAs have a unique role to play at this moment in contributing to the grid and should not
15 be saddled with all DRAM requirements at this time (see page 11 of Voltus Direct
16 Testimony).

17 **III. Conclusion**

18 We appreciate the opportunity to provide insights at this urgent time for California. We look
19 forward to a continued engagement with all parties to identify the most effective solutions.

20 **IV. Statement of Qualifications**

21 Carmen Best is the VP of Policy & Emerging Markets at Recurve Analytics, Inc. With over 15
22 years monitoring demand-side management in California, Ms. Best has worked with utilities, state
23 agencies, commissioners, and advocates to enable demand flexibility to scale as a reliable grid
24 resource. She supports the consistent valuation of the impacts of demand-side interventions and
25 accessible analytics to drive market-based decarbonization. Prior to joining Recurve, Ms. Best
26 spent over 10 years working directly with the California Public Utilities Commission. She held
27 multiple positions within the energy efficiency branch to ensure findings and insights from
28 evaluation could inform statewide energy policy. She led the Energy Efficiency Commercial
29 Programs & Evaluation team and served as a senior analyst. She facilitated the Commission's

1 transition to standardized data and reporting, priority-based evaluation planning, and stakeholder
2 engagement processes to manage its large-scale energy efficiency evaluation portfolio. In these
3 roles, she supported demand forecasting, integrated resource planning, and overall improvements
4 in the deployment of energy efficiency.

5 Ms. Best holds a Master of Science in Land Resource Management and Energy Analysis and
6 Policy from the University of Wisconsin-Madison and a Bachelor of Science degree in Geology
7 from the University of North Dakota.

8 **V. Verification**

9 I hereby verify that I, Carmen Best, have on this date prepared this “**REPLY**
10 **TESTIMONY OF RECURVE ANALYTICS, INC IN RESPONSE TO ALJ STEVENS**
11 **EMAIL RULING OF AUGUST 16, 2021 REGARDING STAFF CONCEPT PROPOSALS**
12 **FOR SUMMER 2022 AND 2023 RELIABILITY ENHANCEMENTS**”. The contents of the
13 document are true of my own knowledge, except as to matters that are stated on information or
14 belief, and as to those matters that I believe them to be true.

15 Executed *September 10, 2021 at Berkeley, California.*



16 /s/ _____

17 Carmen Best

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