**Memo on Public Comments received on Clean Peak Standard Guidelines**

Guidelines published 8/14/20

Comments received on 9/4/20 from Ecobee, EnelX, NECEC, SRECTrade, SunRun, SYSO, Zero Point Energy

**Comments Summary**

* Demand Response
  + Define Commercial Operation Date for ES & EVSE as DR
    - Clarify ES & EVSE installed after 1/1/2019 is not existing. (EnelX & NECEC)
  + EVSE
    - Ask for aggregate EV charging networks to get CPECs for charging off-peak (SRECTrade)
    - Establish a DR working group focused on EVSE (EnelX)
      * DR Guideline
      * CMR 21.05(2)
  + Permit aggregated SQA submissions in PTS for smart thermostat enrollments (ecobee)
    - Allow HVAC run-time as a suitable proxy for metered demand reduction
  + Meter reporting intervals: Regulation identifies 15-minute intervals while the DR guideline specifies hourly (EnelX)
  + Allow whole home registration as single DR instead of disaggregating solar, ESS, & load (SunRun)
* Procurements
  + Publish a Procurements Guideline (NECEC)
* Eligibility Guideline
  + Define standalone energy storage is eligible if it charges from renewables (Zero Point)
* Distribution Circuit Multiplier
  + Provide stakeholder opportunity before implementation & advance notice before implementing since it impact projects (NECEC)
  + Grandfather Distribution Circuit Multipliers effective at time of SQA (SYSO)
  + 1) Tie the multiplier to ISO-NE market registration, 2) roll out multiplier on circuits with over 8MW or 50% of circuit nameplate in DG, and 3) areas where peak load is greater than 60% of circuit rating (Zero Point)
* Resource Eligibility
  + Transmission interconnection geography questions
    - Seeking clarification on what constitutes a delivery “obligation”
* Create a Actual Monthly System Peak Multiplier Guideline explaining it’s purpose (Zero Point)

**Recommended Responsive Guideline Changes**

* DR Guideline;
  + Commercial Operation Date: Add clarification that resources installed after 1/1/2019 are not existing
  + Interval Reporting: Update guideline to match regulation. Can always update guideline again in later future if/when DR demonstrates a need to shift to hourly reporting.
* Distribution Circuit Multiplier Guideline
  + Clarify that Distribution Circuit Multiplier at time of SQA is effective for life of project
* Draft a Procurements Guideline for release post-workshops outlined below

**Recommended Responsive Actions Other Than Guideline Changes**

* Set up Second CPS Demand Response Working Group Meeting
  + Subgroup 1) EVSE
  + Subgroup 2) Smart Thermostat runtime load fraction alternative to metering
    - Changing aggregation size?
    - Prevent double enrollment with EE aggregations
    - (weather correlated? Season correlated?)
* Announce and host a Procurements Conference to discuss procurements structure prior to releasing a procurements guideline.
  + Release a straw Procurement document to guide the conversation
    - Target late October 2020 for conference
  + Release a Procurement Guideline following the conference
* Internal investigation into potential early rollout of Distribution Circuit Multiplier for circuits with High DG and with relative Peak Load compared to circuit rating. Follow up with potential proposed methodologies with EDCs.

**CPS Guideline Next Steps**

* Redline guidelines per above recommendations
  + Publish to website following review and approval
* Schedule a CPS DR Working Group with EVSE & HVAC subgroups
* Schedule a CPS Procurements Conference