



August 10, 2021

Patrick Woodcock, Commissioner  
DOER CPS Team  
Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston MA, 02114

**Re: Clean Peak Demand Response Resource Revised Guideline Comments**

Dear Commissioner Woodcock and DOER CPS Team,

Enel X<sup>1</sup> appreciates the opportunity to provide feedback to the Department of Energy Resources (DOER) on the Clean Peak Standard (CPS) *Clean Peak Demand Response Resource Guideline*. We have also appreciated the opportunity to participate in DOER's Demand Response (DR) Working Group.

As drafted, the CPS DR Guidelines provide for a robust DR participation model that fairly and appropriately balances rate payer costs, the Commonwealth's aggressive GHG targets, and the durable financing requirements necessary to develop clean, flexible resources. The DR CPS Guidelines will benefit all stakeholders by providing greater certainty and confidence in resources' participation in the CPS. Our comments focus on Electric Vehicle Supply Equipment (EVSE) and Load Curtailment DR.

1. **The Guidelines should allow Aggregated DR Resource Reporting** – DOER should clarify that a "demand response resource" may be an aggregation of individual DR assets enrolled as a single resource and the reported 15-minute interval data will be the summation of all kWh curtailed.

---

<sup>1</sup> **Enel X** is Enel's global business line dedicated to the development of innovative products and digital solutions in sectors where energy is showing the greatest potential for transformation: cities, homes, industries and electric mobility. The company is a global leader in the advanced energy solution sector, managing services such as demand response for over 6 GW of total capacity at global level and 110 MW of storage capacity installed worldwide, as well as a leading player in the electric mobility sector, with approximately 130,000 public and private EV charging points made available around the globe. Enel X in North America has approximately 4,500 business customers, spanning more than 35,000 sites, representing approximately \$10.5B in energy spend under management, approximately 4.7 GW of demand response capacity and over 70 battery storage projects that are operational and under contract.

This is necessary to reduce participation barriers for small distributed resources such as EV chargers and load curtailment. Additional details on this topic are included below.

2. We **support the EVSE 35% static baseline measurement and verification (M&V) methodology** as a simple, transparent, and accurate approach that encourages robust participation by electric vehicles. Directly metering participation at the EVSE and not the retail delivery point will greatly simplify M&V without compromising on the value delivered by the resources to the CPS program.
3. We **support allowing energy dispatched from the EVSE to adjust the 35% baseline** in combination with otherwise avoiding charging on-peak as it provides necessary and maximum flexibility in how EVSE provide benefits to the grid. Electric vehicles are unique as a storage resource given their primary use application is transportation and this design allows EVs to provide the benefits of DR and storage most effectively.
4. We **support allowing Load Curtailment to provide a proposed baseline approach** for DOER's review and approval as a pragmatic means to allow a range of participation options.
5. We encourage DOER to **specifically include a "Day-Of Adjustment" requirement within the Load Curtailment DR Determinations**, or at a minimum ensure any intended baseline approach include such an adjustment to receive DOER's approval. Such consumer protection mechanisms are essential to prevent compensation for a customer that shuts down for maintenance from getting unfairly compensated.
6. We ask that DOER **clarify how Clean Peak demand response resources utilizing a static baseline will be evaluated for multipliers**. For DR resources that reduce load it is not clear how they would be evaluated for performance during the monthly system peak as their metered value is zero. We recommend that as long as the DR resource has reduced its consumption during the Seasonal Clean Peak Window and the monthly system peak hour, that a prorated portion of its daily CPEC eligible kWh be assigned for the CPEC multiplier.
7. **Establish a Q3 2021 DR Participation Start Date** – We encourage DOER to implement the Clean Peak Demand Response program for Summer 2021 (i.e. 2021 Q3) reporting.

**To encourage EVSE and Load Curtailment in Clean Peak via a simplified registration and reporting process for aggregations of small resources we provide these additional comments.** Demand Response resources tend to individually represent small opportunities for load reduction. Unlike larger RPS generation resources or energy storage systems with nameplate capacity ratings in the 100s to 1000s of kW, it may not be cost effective for each *individual* DR resource to register in the NEPOOL GIS, register at the Production Tracking System (PTS), complete a Statement of Qualification (SQA), and register to report. Similar to how Demand Response resources currently participate in the ISO-NE wholesale markets and will participate under FERC Order 2222, we encourage DOER to adopt a similar approach and provide



clarity that a “*Demand response resource*” may represent an aggregation individual assets that collectively as a resource result in “...*changes in electric usage by end-use customers in the commonwealth...*”. Absent the ability to aggregate DR assets for enrollment and reporting purposes the logistical and costs associated with individual resource registration and reporting may greatly hamper Demand Response participation in the Clean Peak program.

We suggest the following design criteria to help DOER implement this clarification:

1. Grant DOER both broad audit rights of underlying asset-specific data and CPEC invalidation rights.
2. Require self-attestation that a pre-approved or standardized notification be provided to enrolled customers that includes a description of potential revenue streams.
3. For EVSE DR, minimize the exchange of personally identifiable and detailed charging information at the customer level.

Lastly, Enel X thanks DOER for their previous clarifications to the Demand Response “Commercial Operation Date” definition that new energy storage, EVSE, and other Demand Response Resources installed after January 1, 2019 can qualify as *New* and not *Existing* Resources when installed at a facility that has previously engaged in demand response programs. This avoids confusion for new resources in instances when other types of demand response have previously participated as DR at the same customer location.

## Conclusion

Enel X appreciates the DOER’s development of the Clean Peak Standard and we hope these comments are useful in finalizing the Demand Response Resource Guidelines. Please do not hesitate to contact us with any questions.

Sincerely,

/s/

## Michael X Macrae

Senior Manager Regulatory Affairs, Northeast Region  
Enel North America, Inc.  
One Marina Park Drive, Suite 400, Boston, MA 02210  
M +1 617 485 8275  
[michael.macrae@enel.com](mailto:michael.macrae@enel.com)