

Principles for Implementation

Completed DEER and Workpapers (WPs) Needed to Inform Solicitation Responses: Whichever path/timeline: Implementers need updated WPs to develop and submit comprehensive bids in response to solicitations.

Adhere to the Bus Stops: The Bus Stop process of D.15-10-028 provides for a process by which updates are incorporated into the portfolio in a regular, predictable, and transparent schedule. It should be followed.

Allow the Portfolio to Roll: The Bus Stop process means that portions of the portfolio will be based on older policy (assuming the DEER peak definition changes). These can be updated if/when contracts are renewed or if/when they are re-bid.

60%+ Third Party Requires Certainty: Adhering to the established Bus Stop protocols supports certain, predictable, and consistent application of the rules. It provides the necessary regulatory and market certainty that third-parties will require to deliver savings.

Implementation Date	Pros	Cons
2020: Designated Time Period (i.e. 4-9 p.m.)	<ul style="list-style-type: none"> New DEER Peak updates would be included in 2020 programs, assuming WPs are available by early 2019 for solicitations 	<ul style="list-style-type: none"> Would require early guidance from CPUC on 2020 DEER Peak in June 2018 – Departure from Bus Stop process Requires accelerated WP updates – If WPs aren’t done, solicitations will move forward with the old/current definition of DEER Peak. May be difficult to update inputs in time for the 2020 Goals and Potential Study, inputs needed by end of 2018.
2022: Designated Time Period (i.e. 4-9 p.m.)	<ul style="list-style-type: none"> Sufficient time to adhere to Bus Stop and complete work papers for solicitations in 2021, and program launches in 2022 Clean set of inputs would be available for 2022 and Beyond Potential and Goals Study 	<ul style="list-style-type: none"> More solicitations and programs begin without old/current definition of DEER Peak); will take longer to “roll over” whole portfolio to new DEER Peak
2022: Avoided Cost Calculator Method	<ul style="list-style-type: none"> Could develop a process by which changes in ACC provide more regular, seamless updates to peak savings 	<ul style="list-style-type: none"> May require transitional pause of Demand savings goals for IOUs, and consideration in solicitations Modeling currently used would require a change in inputs ACC load shapes not nearly as comprehensive by measure as current DEER equivalent