

# Integrated Resource Planning (IRP) Resources

## **Comments Submitted By:**

Name: Julia Friedman

Company or Organization: Oracle

Email: [julia.friedman@oracle.com](mailto:julia.friedman@oracle.com)

Phone: 216-973-1685

Company or Organization Website Address: [www.oracle.com](http://www.oracle.com)

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Oracle appreciates the opportunity to comment on the resources presented in E3's April 10<sup>th</sup> IRP workshop. The information in this set of comments repeat some of the information submitted by Oracle in our Reply Comments earlier this year.

### **1. Are there specific resource types that are not adequately captured by the proposed categories and should be reflected in the IRP framework?**

On Slide 26 of the Resources deck from April 10th there is a note that only existing DR capacity was modeled. There is room for expanding demand response resources outside of a VPP and that should be included in the modeling. Among DR resources that exist today, behavioral demand response (BDR), and/or its sister Peak Time Rebates (PTR), should be considered as a DR resource that could be expanded. Nearly all residential and small business customers are eligible to participate in BDR or PTR. Behavioral demand response has been used by utilities in California, Arizona, [Texas](#) (see pages 105 – 110), and Maryland to meet peak system needs during extreme weather events. Baltimore Gas & Electric has been running an opt-out PTR program for years. In 2025, during a peak event day, they reported 150 MW of reduced demand on the grid. Of the 1.1 million customers eligible to participate in the energy savings day, 63% of those customers took action to reduce or shift their usage, earning \$3.2 million in bill credits.<sup>1</sup> These results show the scale and impact of an opt-out behavioral demand response program.

When run as an opt-out program, BDR's potential is significant. In New York, Brattle released [Volume #1 of its Grid Flexibility Potential Report](#), which included modeling for residential BDR and time-of-use rates as cost-effective resources among the 16 grid flexibility options. The

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<sup>1</sup> LinkedIn. [https://www.linkedin.com/posts/divesh-gupta-5012149\\_energy-savings-day-results-are-in-on-june-activity-7346249380082970624-B74b?utm\\_source=share&utm\\_medium=member\\_android&rcm=ACoAAAAzSLwB3-shDTR3wbjSekSizAO9q\\_Q7irc](https://www.linkedin.com/posts/divesh-gupta-5012149_energy-savings-day-results-are-in-on-june-activity-7346249380082970624-B74b?utm_source=share&utm_medium=member_android&rcm=ACoAAAAzSLwB3-shDTR3wbjSekSizAO9q_Q7irc)

report found residential BDR contributing close to 600 MW in 2040 summer and a little over 200 MW in 2040 winter, as shown in Figure 1.

NY'S GRID FLEXIBILITY POTENTIAL

Program-specific Potential

Individual program potential estimates shown below assume each program is offered in isolation; they are not additive.

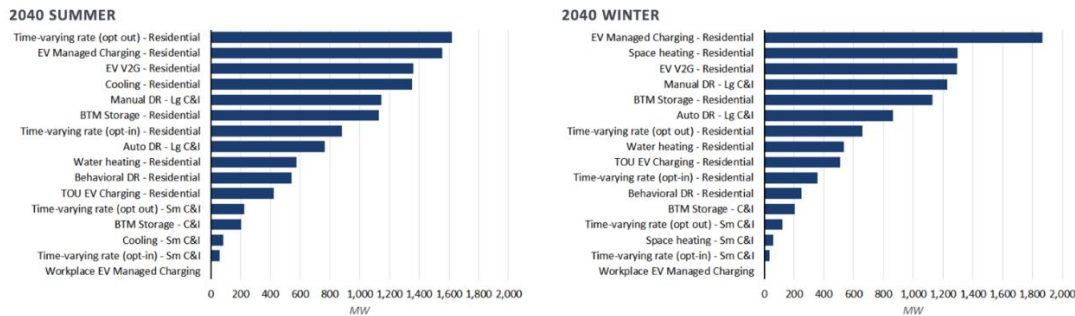


Figure 1 NY Grid Flexibility Potential Study

The IRP resources E3 has proposed are very focused on technologies and we encourage the planning team to consider behavioral resources as well. BDR/PTR resources can be forecast, scheduled, and measured like other demand response resources.

It is also worth noting that Puget Sound Energy considers behavioral demand response as a key component of its [Flex Program](#) (akin to a VPP) so you may choose to include behavioral resources within the representative VPP for IRP modeling purposes, although it is not entirely clear that BDR resources will be eligible under the VPPs proposed in response to the Clean and Reliable Grid Act.

Regardless of where it is modeled, BDR has the following characteristics:

- All residential customers with an active email or phone number can participate. There is no requirement to own a home, have a connected device installed, nor does participation require any upfront investments
- BDR can be a year-round resource
- Historically, BDR events are typically called 5 times per summer, although there have been summers where a utility has called more than twice that many events or as few as one event
- Some utilities are using the BDR to address new winter peaks
- Each event lasts approximately 3-5 hours
- Events can be called on consecutive days
- Events can be called with as little as a few hours' notice
- Events can be called on consecutive days
- Behavioral demand response does not involve any incentive payment to the participant. PTR does include an incentive payment that is typically in the \$1 - \$1.25/kWh range
- BDR typically reduces peak demand by 2-3% during peak events

**Please refer to the approach to modeling VPPs in this IRP on slide 29. Are there any targeted refinements you would recommend to improve the robustness of this approach and the results?**

It is unclear what assumptions E3 has made for adoption of DERs *and* participation in VPPs in the difference scenarios. With the right [behavioral interventions](#), adoption and enrollment rates can be scaled.