



**NARUC**  
National Association of Regulatory  
Utility Commissioners



# **NASEO-NARUC Grid-Interactive Efficient Buildings Working Group: Scaling Demand Flexibility with Software**

January 30, 2025, 3:00 pm ET

**Welcome: *Rodney Sobin (NASEO) and Jeff Loiter (NARUC)***

**Scaling Demand Flexibility with Software: Octopus Energy and  
Kraken Technologies**

*Rajiv Shah, Head of North American Policy and Markets, Octopus  
Energy Group*

**Q&A and discussion**

**Wrap-up**





# NASEO-NARUC Grid-Interactive Efficient Buildings Working Group: Scaling Demand Flexibility with Software

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## *Logistics:*

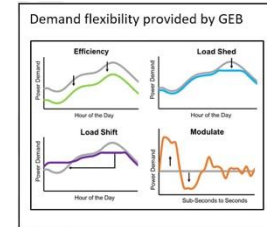
- Please mute when not speaking.
- Please use Q&A box or chat to offer questions.
- Slides and recording will be posted.



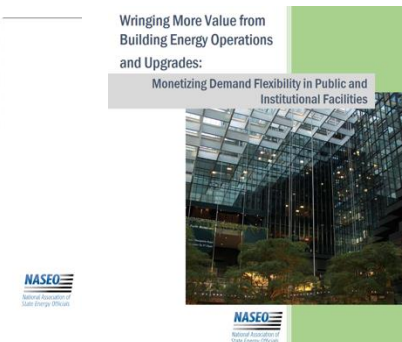
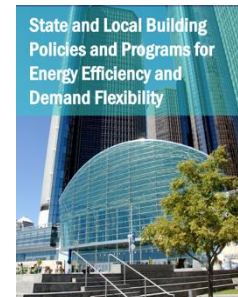
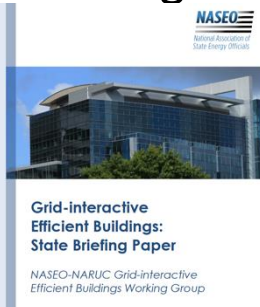
# + NASEO-NARUC Grid-Interactive Efficient Buildings (GEB) Working Group

<https://naseo.org/issues/buildings/naseo-naruc-geb-working-group>

Inquiries: [GEB@naseo.org](mailto:GEB@naseo.org)



- GEB/demand flexibility/grid-edge management can:
  - Lower costs, enhance resilience, reduce emissions
  - Reduce peak loads, moderate ramp rates, provide grid services
  - Enhance energy efficiency, integrate distributed and renewable energy resources
- Questions:
  - How to optimize facility interactions with grid? How to coordinate DERs?
  - How can state policies, programs, regulations advance GEB/DF/DER benefits?
  - What are roles for states, facility owners and operators, utilities, tech and service providers, and others?
- Forums, state exchanges, national lab tech assistance, reports, resources...
- U.S. DOE, Building Technologies Office support



# + NASEO-NARUC Grid-Interactive Efficient Buildings Working Group

<https://naseo.org/issues/buildings/naseo-naruc-geb-working-group>

## ■ Working Group co-chairs:

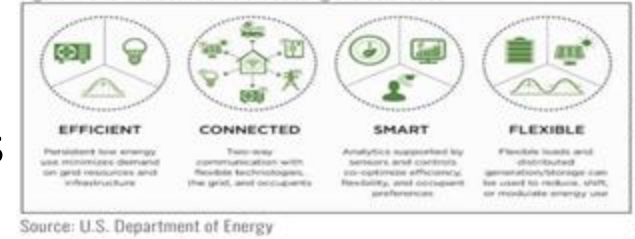
- Liz Reichart, MA Dept. of Energy Resources
- Ashley Norman, Hawaii PUC staff

## ■ Working Group – 30 states and territories:

- |             |                      |                |
|-------------|----------------------|----------------|
| Arkansas    | Maryland             | Oregon         |
| Arizona     | Massachusetts        | South Carolina |
| California  | Michigan             | Tennessee      |
| Colorado    | Minnesota            | Utah           |
| Connecticut | Mississippi          | Vermont        |
| Florida     | Nebraska             | Virginia       |
| Georgia     | New Jersey           | Washington     |
| Hawaii      | New York             | Wisconsin      |
| Idaho       | Pennsylvania         | Wyoming        |
| Illinois    | District of Columbia | Virgin Islands |

Inquiries: [GEB@naseo.org](mailto:GEB@naseo.org)

Figure 1. Grid-interactive efficient building characteristics



# + NASEO-NARUC Grid-Interactive Efficient Buildings Working Group

<https://www.naseo.org/issues/buildings/naseo-geb-resources>



What's new?

• Upcoming:



## New/recent items:

- DOE announced [Connected Community 2.0 and Smart Charge Management Awards](#)
- DOE, [Pathways to Commercial Liftoff; Virtual Power Plants 2025 Update](#)
- DOE, [Sourcing Distributed Energy Resources for Distributed Grid Services](#)
- LBNL VPP and Demand Flexibility Reports (December 2024 - January 2025)
  - [DER Integration Framework: Regulatory Innovation for DER Compensation and Cost Allocation](#)
  - [Distributed Energy, Utility Scale: 30 Proven Strategies to Increase VPP Enrollment](#)
  - [Virtual Power Plants: Insights, Profiles and Inventory](#)
  - [Moving Beyond Direct Load Control: A Maturity Model for Realizing the Promise of Demand Flexibility](#)
  - [State regulator opportunities to advance distributed energy resources aggregations in wholesale markets.](#)
- [Colorado Microgrid Roadmap](#) -- NASEO-NARUC State Microgrid WG [webinar](#) March 21, 1-2pm ET
- Maine Governor's Energy Office (GEO) [Distribution System Operator \(DSO\) Feasibility Study](#)
- [Ann Arbor's Sustainable Energy Utility \(SEU\)](#): opt-in, supplemental, community-owned energy utility that will 100% RE from local solar and battery storage systems installed at participating homes and businesses in the city.

## Our previous Working Group Forum

- **NASEO-NARUC Grid-interactive Efficient Buildings (GEB) Working Groups Forum: RMI Virtual Power Plant (VPP) Flipbook - September 4, 2024**

# + NASEO-NARUC Grid-Interactive Efficient Buildings Working Group

<https://www.naseo.org/issues/buildings/naseo-geb-resources>



What's new?

• Upcoming:

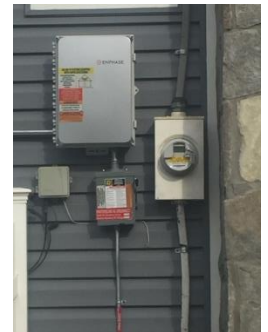


## Upcoming:

- In-person training open to NASEO, NARUC, NASUCA members:
  - [NASEO-NARUC Training for States on Integrated Distribution System Planning 2.0: Planning for Electrification and Distributed Energy Resources](#) March 11-12, 2025 - Detroit, MI
  - [NASEO-NARUC Training for States on Integrated Distribution System Planning 2.0: Planning for Electrification and Distributed Energy Resources](#) April 30-May 1, 2025 - Denver, CO

## Seek suggestions for future forums and webinars. Possibilities:

- Sourcing DERs for Distributed Grid Services
- Connected Communities Update
- Smart Charge Management
- Upcoming LBL reports on
  - Coordinated Controls – DERMS
  - Utility and Business Model Frameworks and Scaling



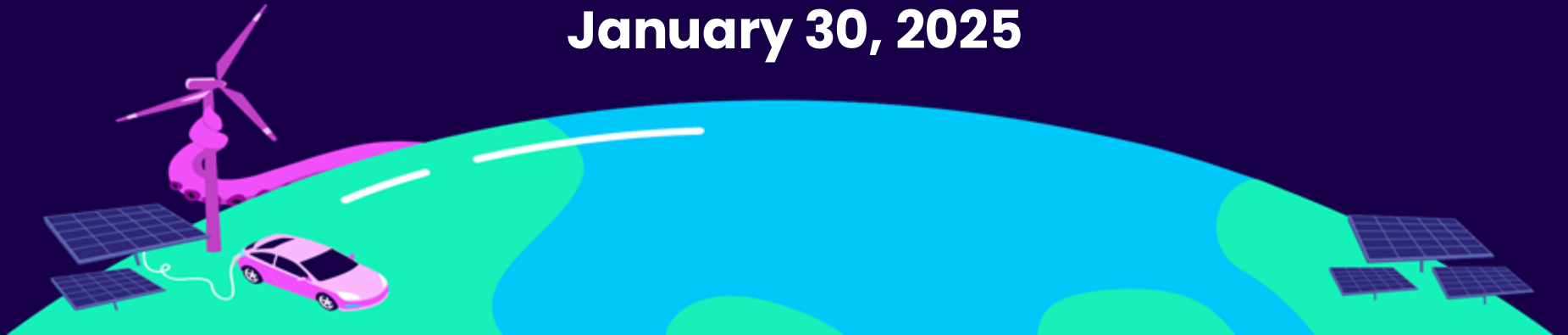


# KRAKEN

PART OF THE octopusenergy GROUP

## Presentation to the NASEO-NARUC GEB Working Group

January 30, 2025



# Agenda

- **Intro to the Octopus Energy Group + Kraken (5 mins)**
- **Problem Statement and Challenges (10 mins)**
- **Scaling Demand Flex & VPP Solutions (15 mins)**
  - **Customer-centric approach**
  - **Interoperability**
  - **Promoting market-based solutions to valuing DERs**
- **Q&A/Discussion (30 mins)**



# **Introduction to the Octopus Energy Group and Kraken**

# OEG | Working across 4 key areas for the energy transition

Octopus Energy 

Kraken 

## Generation



- **\$7bn** generation assets managed
- **14 countries**
- Fan Club community generation

## Retail Energy



- **8m customers / 12m accounts**
- **8 countries**
- #1 for customer service
- World-leading consumer flex
- Europe's largest VPP (**170k+ devices**)

## Services



- **EV leasing** & EV charger installation
- **Heat pump** tech & installations
- **Solar and meter** installations
- **Electroverse** EV charging network

## Tech



- Single platform to manage customers and assets
- **18 countries**
- **50m** contracted retail accounts
- **43GW** flexible assets contracted

>\$9bn valuation,  
with financial backing from:



generation\_

CPP Investments



octopusinvestments

# Quick Overview of the Kraken Platform

# Kraken is the new end-to-end operating system for future-focused utilities

## Customer

CIS & Billing  
Meter Data Management  
Customer Relationship Management (CRM)  
Customer Interaction

## Field

Job & Workforce Management  
Material Management  
In-field App  
Customer Service & After Care

End to -end system  
Cloud-native  
Continuous integration  
Data intelligence and AI bots  
Self-served differentiation

## Infrastructure Flex

Utility scale asset control and optimization

## Grid

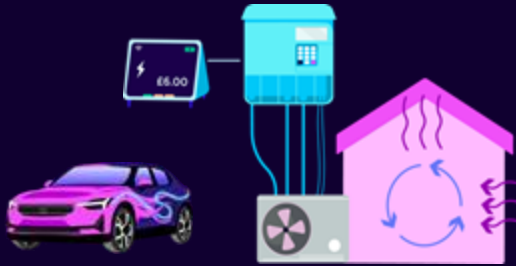
Low Voltage monitoring  
Congestion forecasting

## Smart Flex

Consumer engagement, device control and optimization

# Flexibility Products

## Residential



### SmartFlex

- EV charging
- Heat pump optimization
- Solar PV control
- Home battery control
- Thermostat control

## Commercial & Industrial / Front of meter



### InfraFlex

- Large scale storage
- Utility scale solar PV
- On/offshore wind farms
- Demand side response

Total Power  
**37.21** GW

Contracted  
**42.35** GW

Assets  
**345,669**

Commercial **Domestic**

⚡ Asset breakdown

1.41 gw

● EV Charge Point	108,512	33%
● Electric Vehicle	107,561	32%
● Home Mini	103,468	31%
● Thermostat	7,700	2%
● Battery	3,343	1%
● Other	1,630	0%

⚡ Asset breakdown

35.79 gw

● Onshore wind	16.25 gw	45%
● Offshore wind	7.96 gw	22%
● Solar	7.45 gw	21%
● Battery	1.47 gw	4%
● Gas generation	658 mw	2%
● Other	2.01 gw	6%

♻️ Estimated carbon savings (last 12 months) ⓘ

**7014** tonnes  
CO<sub>2</sub> prevented



=

**701366** trees  
of CO<sub>2</sub> captured



Based on a tree absorbing 10kg CO<sub>2</sub> per year

**Most diverse  
portfolio of  
DERs and  
largest EV  
VPP**

## **Background context:**

Proliferation of DERs is changing power flows on the grid and increasing demand, shapes → leading to system balancing challenges & increasing costs

## **Problem statement:**

To manage the challenges posed by DER proliferation, utilities are deploying various demand flexibility tools (e.g. DERMS, VPPs) → but results have largely been small and siloed

# Challenge #1

Booming number and  
variety of energy assets





# 200 million new devices by 2030

2023-30  
device  
growth



2x

9x

5x

2x

8x

5x

3x

2x



8x

5x

6x

5x

7x

4x

8x

9x



2x

3x

2x

2x

2x

4x

2x

2x

2023

2030 2023

2030 2023

2030 2023

2030 2023

2030 2023

2030 2023

2030 2023

2030

200 million new devices by 2030

Devices



Countries



40 million today

2023-30 growth

# Challenge #2

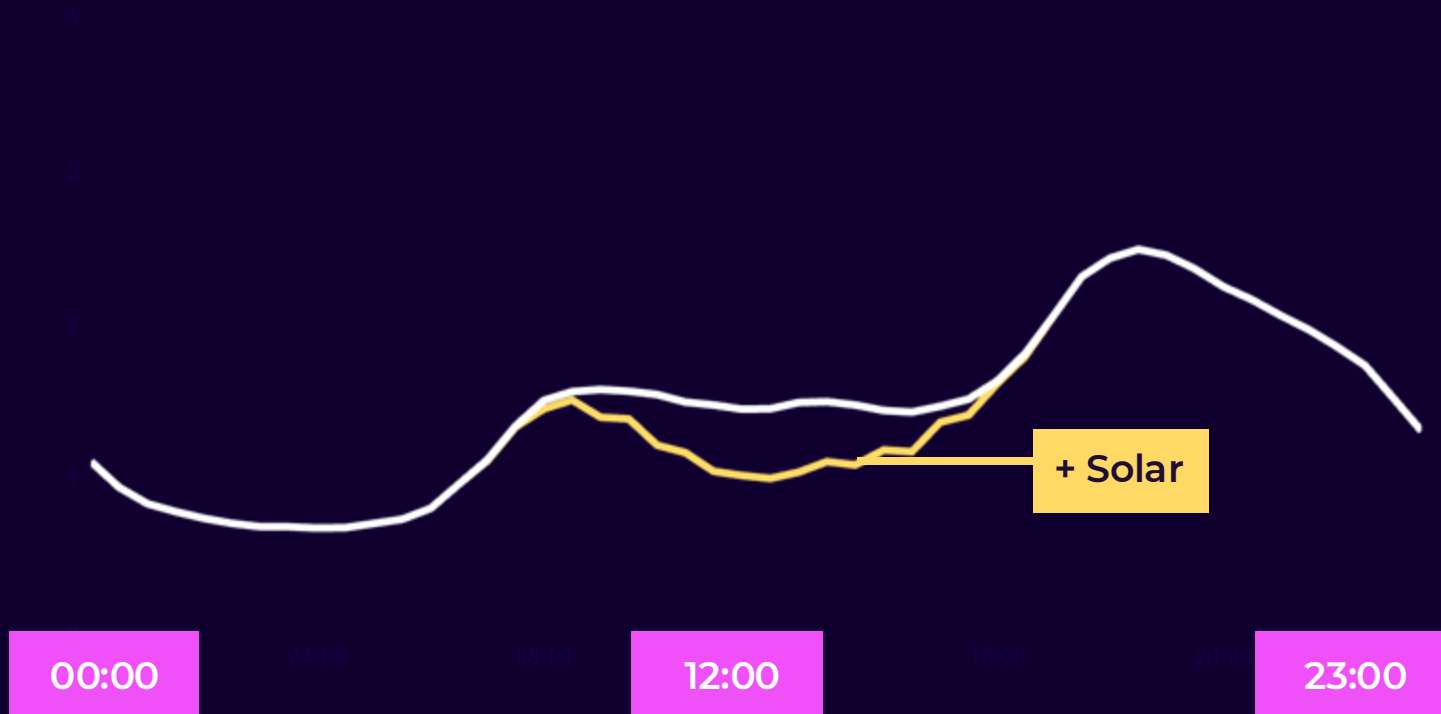
## Changing consumer demand profile



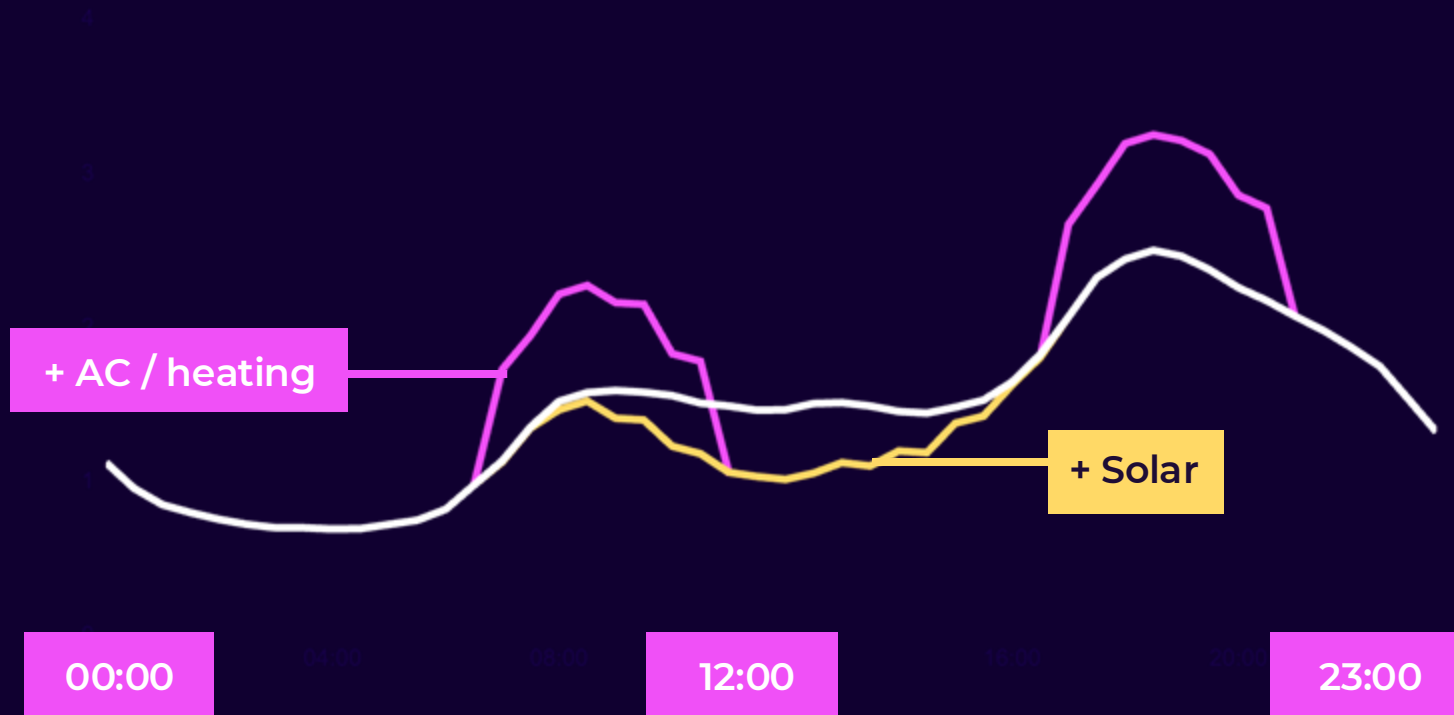
# Energy Use



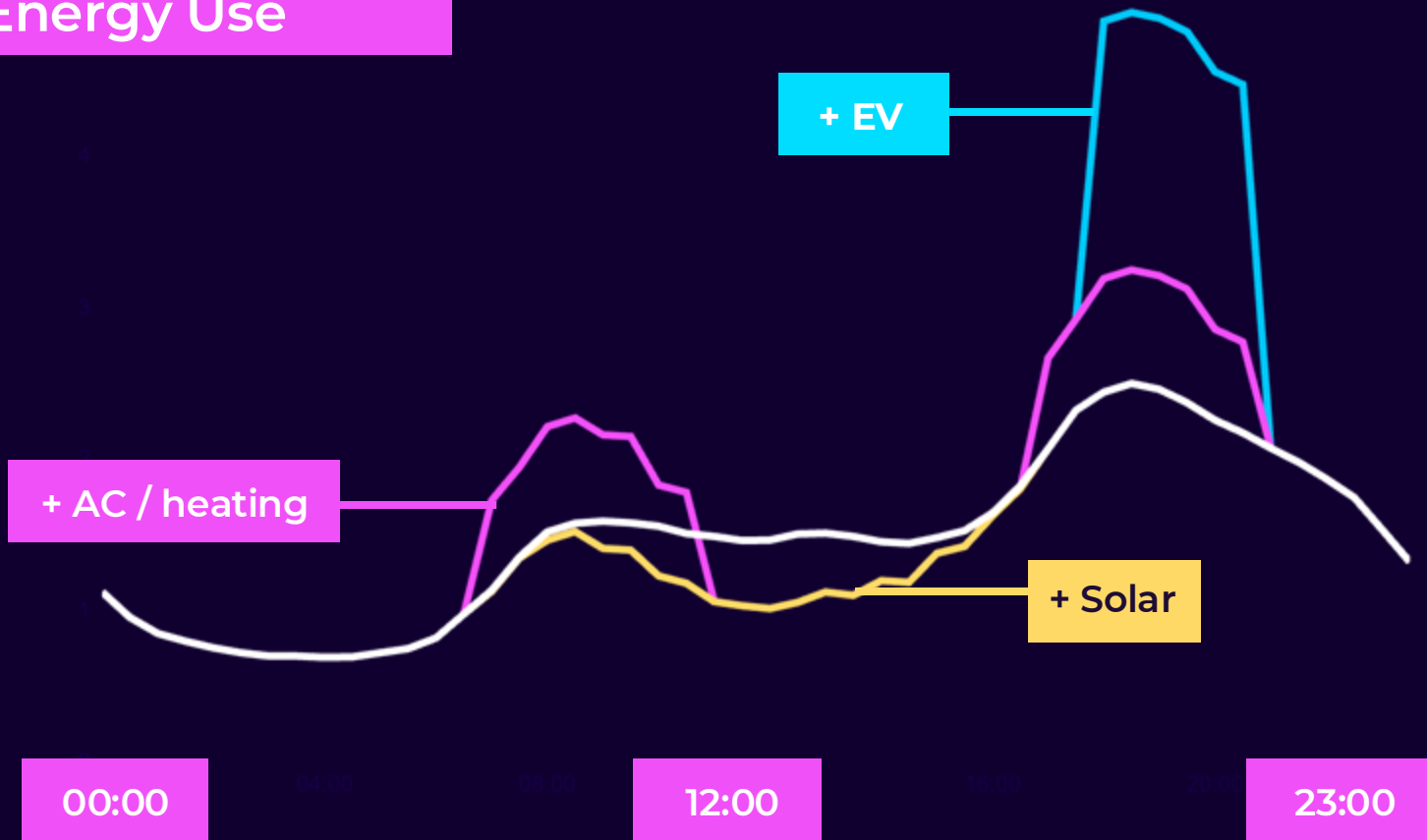
# Energy Use



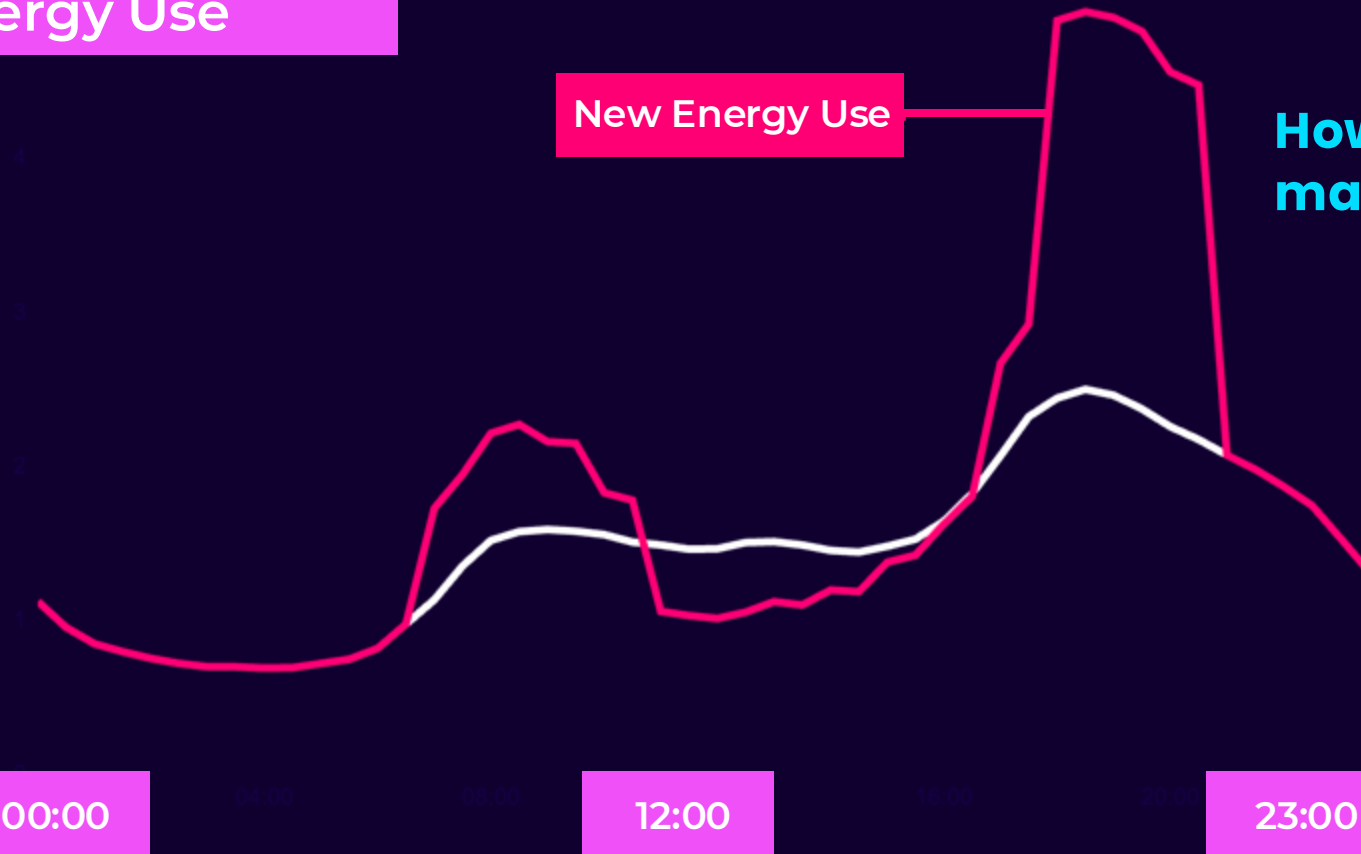
# Energy Use



# Energy Use



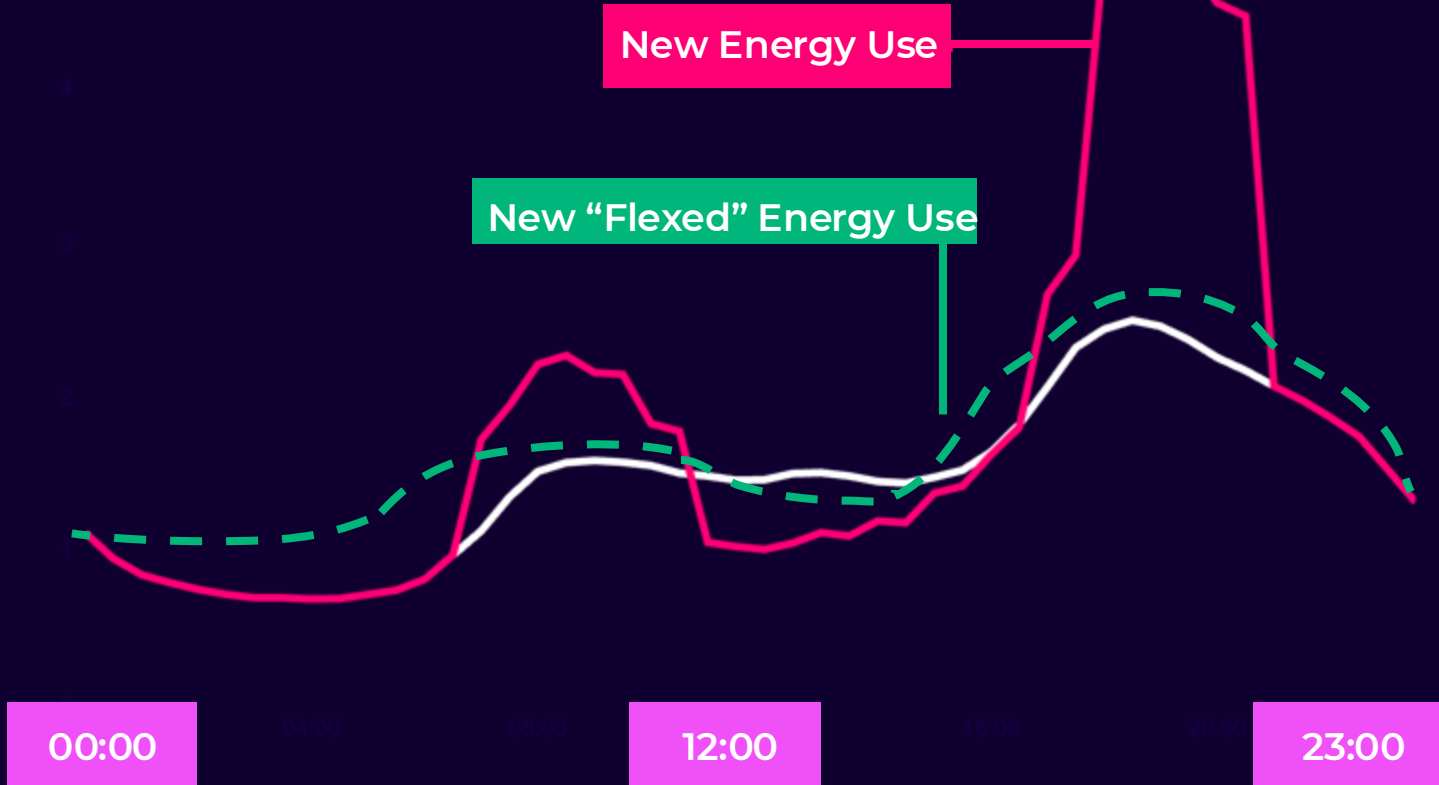
# Energy Use



How to manage..?



# Energy Use



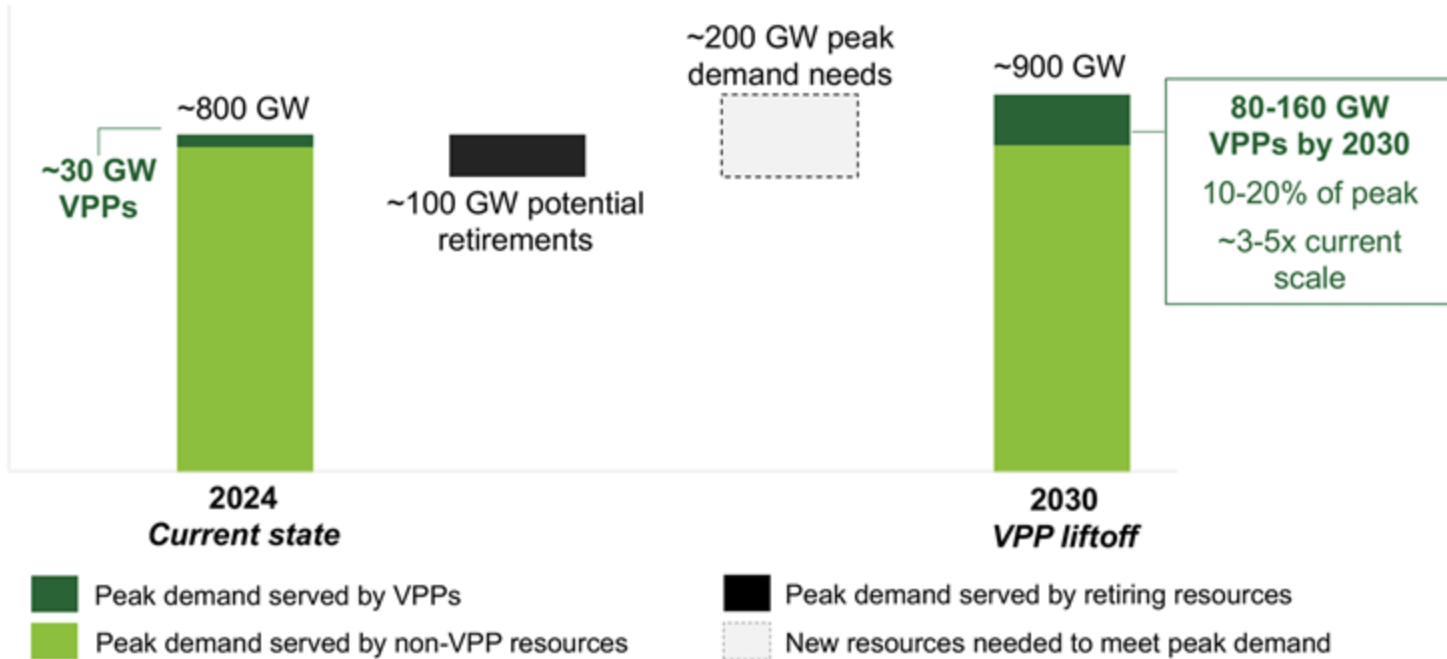
# Challenge #3

Growth in demand and associated costs



# Why are we here? We need 160 GW of flex

US peak electricity demand



Source: [2025 DOE Virtual Power Plants 2025 Update](#)

## Where we are coming from

Over **50%** of eligible EVs enrolled in Octopus Energy's VPP

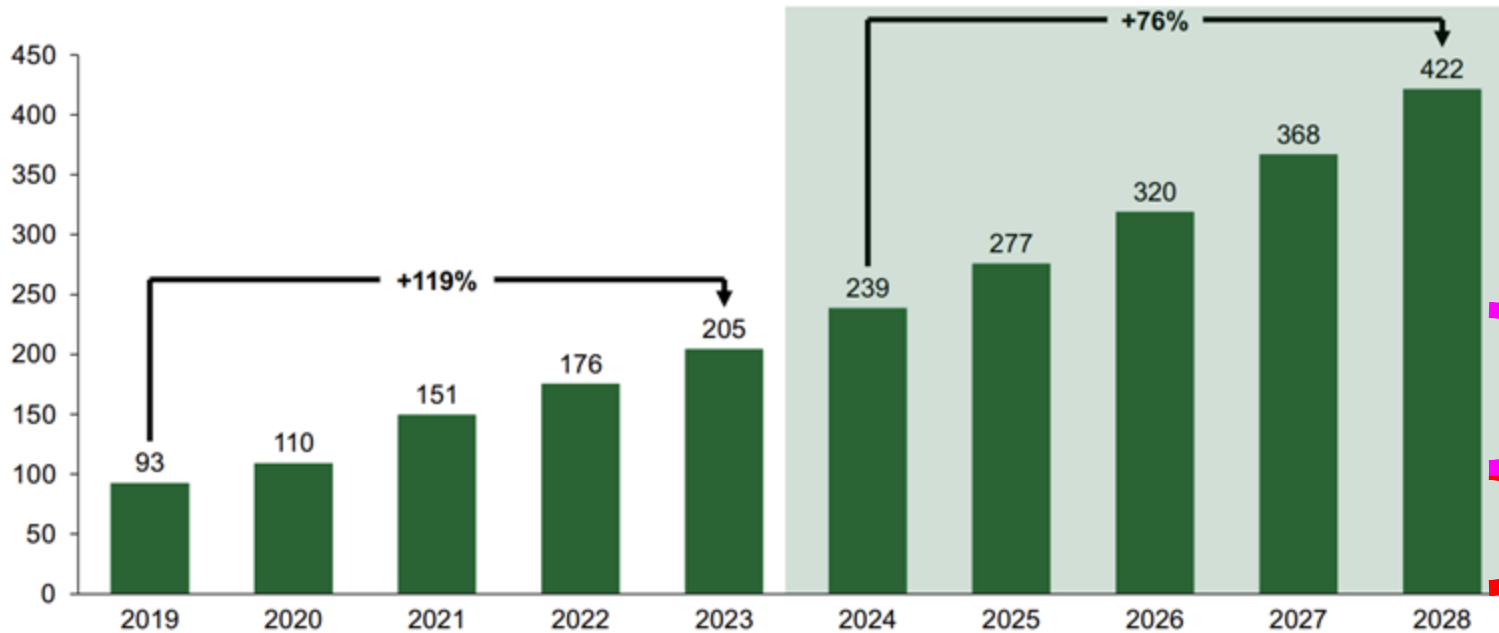
## Where we find ourselves

“Less than **20%** of eligible DER enrolled in VPPs”



# 20% does not get us to 160 GW

Total DER capacity installed (historical and forecasted), GW



New strategy required to hit scale

20% enroll only gets 80 GW

# SmartFlex in Action - Intelligent Octopus

Select the device you would like to integrate with

If you have multiple devices, just pick one.

Intelligent Octopus may only be able to connect to certain models.

- Electric Vehicles
- Chargers
- Heat pumps
- Thermostats

9:41

Electric Vehicles

Connecting to EVs gives us your vehicle's state of charge, so we can provide more accurate charging

- Tesla
- Jaguar
- Land Rover
- Volkswagen
- Ford
- Kia

Hi Harry,

Let's get you set up

- Car: Tesla Model 3 Standard Range +
- Charger: Generic 7kW

+ Authenticate device

+ Test charger connection

9:41

Plug in your car after 5pm to create your Smart Charge plan

Charging preferences

Charge limit: 80% | Ready by time: 07:30

Need to charge now? [Book a Charge](#)

12 hour Charging History

Total charge amount: 153kWh

9:41

We've mapped tonight's Smart Charge!

View Smart Charging schedule

- 10:00am - 10am
- 1:00am - 1:00am
- 3:00am - 4:00am
- 5:00am - 6am

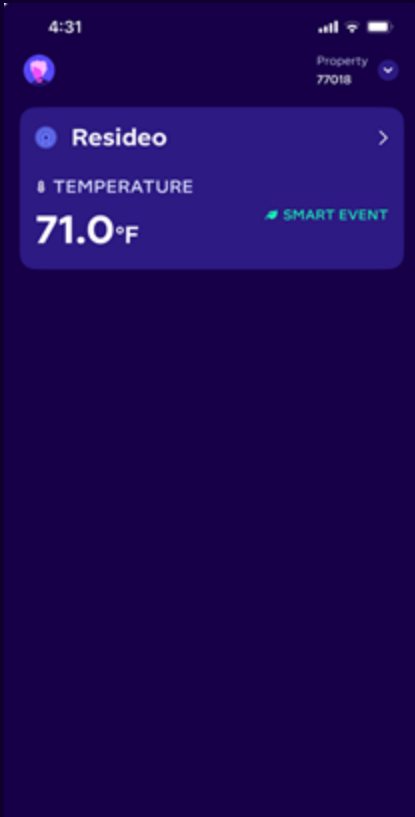
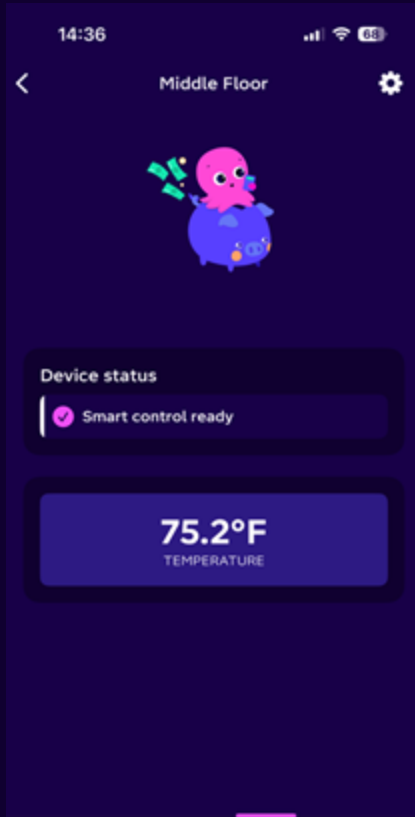
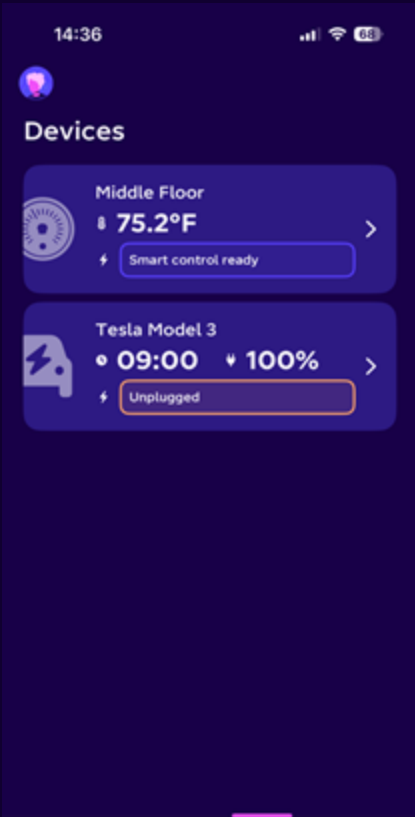
Charging preferences

Charge limit: 80% | Ready by time: 07:30

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12 hour Charging History

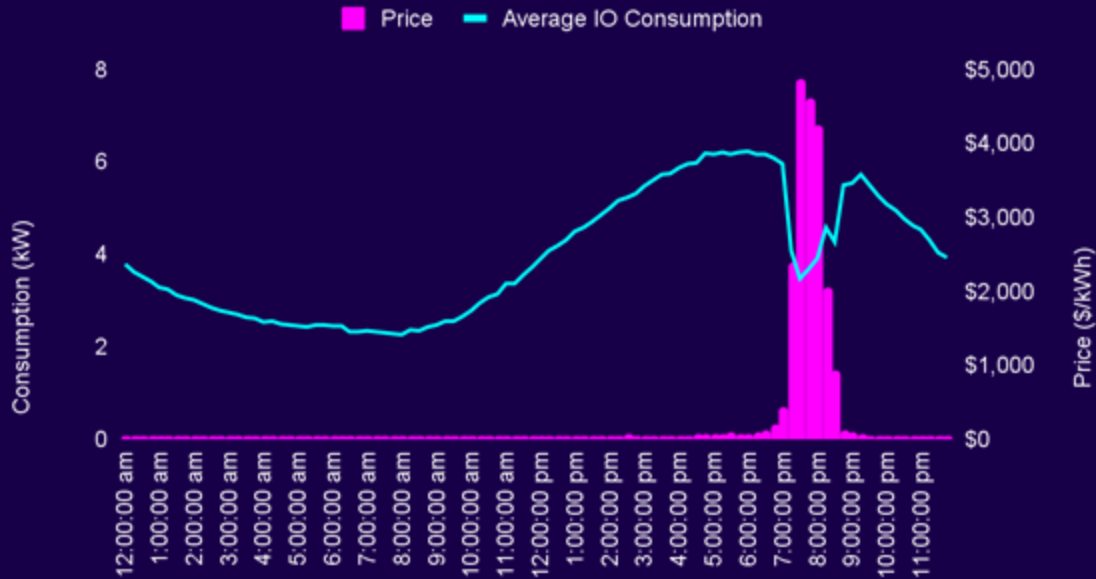
Total charge amount: 153kWh





On the warmest Texas days, Octopus leverages Kraken to call thermostats to provide a 40% reduction in peak load when the grid is stressed

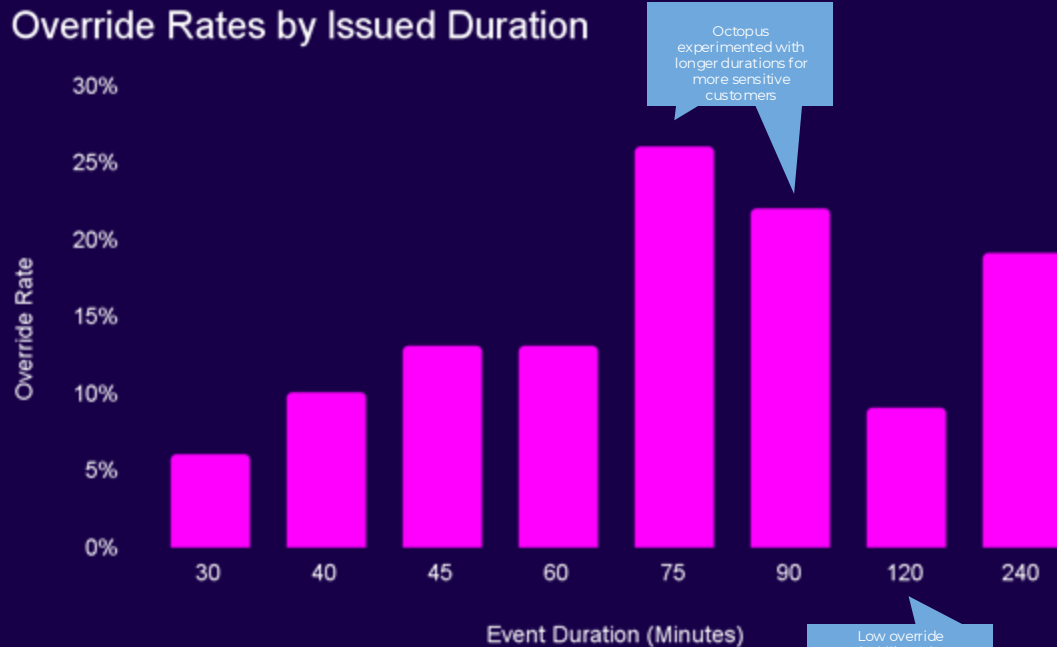
August 20th, 2024 Consumption vs. Price



💡 Potential load reduction increases as peak load increases with progressively higher temperatures.

💡 On the hottest days, we have observed a **2.5kW peak load reduction per customer** on average for OEUS customers.

We can squeeze more demand flex value by utilizing customer data to experiment and innovate



Octopus experimented with longer durations for more sensitive customers

Low override probability cohorts received most 120min holds. The low override rate showcases the power of cohorting

🔑 Evidence suggests that most OEUS customers can tolerate up to 60 minutes without increasing override rates substantially.

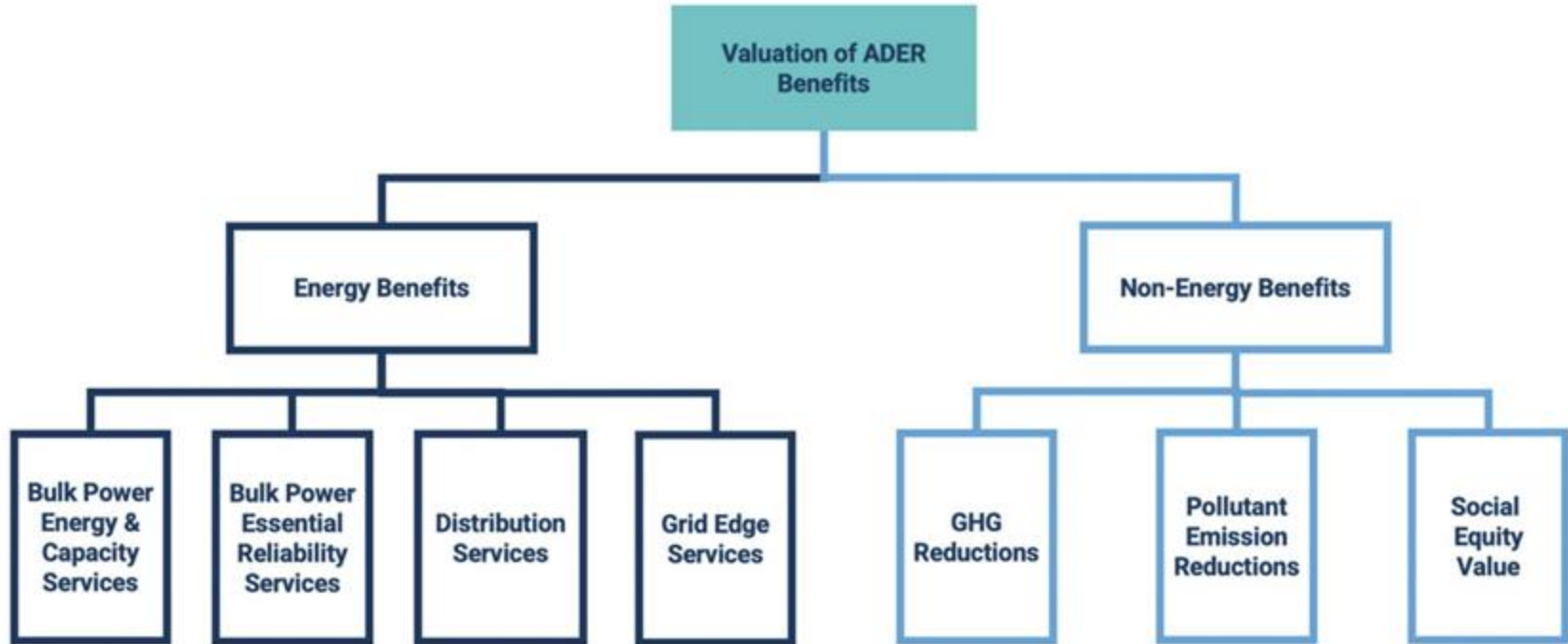
🔑 Cohorting customers enables us to maximize the duration and depth of events across the portfolio while maintaining ~10% override rate.

💡 With most price events lasting 45 - 60 minutes this year, we have confidence that we can clip consumption for most or all of our portfolio for the entire event duration.

# Scaling Demand Flexibility and VPPs

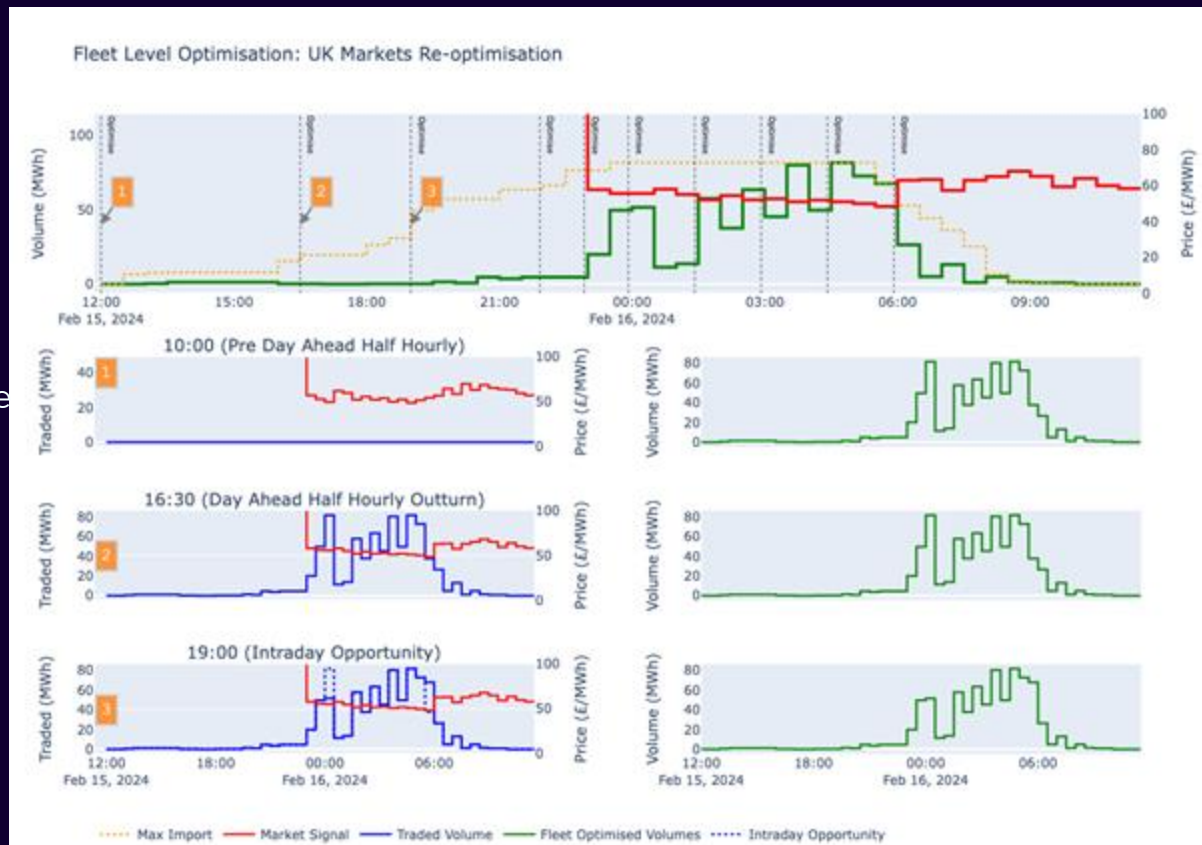
## #1. Promoting solutions for valuing DERs

# Overview of the value streams DERs can provide



# Kraken in the UK - optimizing across different markets

- ✓ Day ahead trading
- ✓ Real-time trading & Net Imbalance
- Volume (NIV) chasing
- ✓ Capacity market
- ✓ Balancing Mechanism
- ✓ DNO contracts



# Approaches to benefits valuation by utility “cohort”

Value Category			Cohort		
			Outside organized markets; utilities own generation assets (Turquoise cohort)	Within organized markets; utilities do not own generation assets (Jade cohort)	Within organized markets; utilities own generation assets (Coral cohort)
Energy Benefits	Energy & Capacity Grid Services	Bulk Power	Based on avoided costs or least cost solution, including ADERs.	Based on market values.	
		Distribution	Based on avoided grid upgrade costs.		
		Grid Edge	Based on customer benefits from service, typically a reduction in bills.		
	Essential Reliability Services	Bulk Power	Based on avoided costs or least cost solution, including ADERs.	Based on market values where they exist. Otherwise based on avoided costs.	
		Distribution	Ancillary service and reliability values based on avoided grid upgrade costs. Resilience values based on value of lost load or reliability improvements.		
		Grid Edge	Based on customer benefits from service, typically through avoided outage costs for the customer.		
Non-Energy Benefits	Reduction in GHG Emissions and Pollutant Emissions, Social Equity	Modeled based on state-specific goals and societal impact assumptions or use values estimated by the EPA.			

# Sample data needed to properly value flexibility as a grid service

## Grid + System

- real-time grid status;
- peak demand & load variability;
- forecasting models for demand, generation, and grid constraints

## DERs

- capabilities, performance metrics, and cost structures
- **real-time telemetry monitoring**

## Markets

- price signals (LMP, TOU rates time-of-use rates, and other market-based pricing signals);
- ancillary service requirements; participation models

## Locational

- substation and feeder-level data, including line capacities and losses;
- congestion data; hosting capacity

## Behavioral + Temporal

- historical DER utilization patterns; user behavior; temporal dynamics

## Valuation Metrics

- avoided costs (e.g. T&D deferrals, avoided generation costs);
- environmental benefits (e.g. carbon reductions);
- resilience and reliability contributions

# Role of SEOs and PUCs to promote valuation of DERs through fair compensation mechanisms

## Advocate for Policies and Market Designs that Allow DERs to maximize their Value

- Develop fair compensation mechanisms (e.g., California's DSGS, New York's VDER, Powering Up Colorado\*)
- Align DER valuation with state energy goals (resilience, equity, decarbonization, energy cost mitigation)

## Share and Facilitate Learnings from other Markets

- Support development of hosting capacity maps, locational value assessments, and DER registries
- Convene stakeholders (utilities, third-party aggregators, and communities) to share best practices
- Highlight successful initiatives like:
  - Hawaiian Electric: DERs for peak shaving and demand response.
  - Green Mountain Power: Residential battery aggregation for grid services

## Promote Solutions

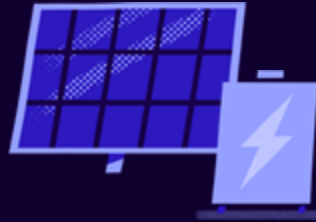
- Encourage non-market solutions like microgrids and community solar for underserved areas



# **Scaling Demand Flexibility and VPPs**

**#2. Seamless Control, Maximum Impact: Why DERs should be interoperable and intro to Project Mercury**

# Growing variety of asset types, brands, models & technical capabilities...



How do we manage this complexity with **scalable solutions**...?

# Managing the Proliferation of DERs: Interoperability is Critical

A surge in DER adoption is providing new grid resources at scale (from a variety of OEMs) with an opportunity to:

- Mitigate grid disruptions
- Tap into existing resources for market and grid operations
- Be proactive in incorporating DERs into Integrated Resource Planning

## Seize the opportunity with integration

- To standardize signals/communications across all DERs for utilities, aggregators and ISOs/RTOs, require interoperability for DERs to receive SEO or ratepayer \$\$
- DERs are customer-owned resources– develop rules that allow the maximum flexibility to monetize their investments

# Illustrative Scenario - customer w/multiple DERs from different OEMs

Consider a customer who owns the following devices from different OEMs:



EV



Battery



Smart Thermostat



mercury

**Mercury is a** collaborative, non-profit initiative, led by EPRI, bringing together manufacturers, utilities, regulators, associations, and tech providers

**With a mission to** develop and promote guidelines for consumer devices to integrate into energy systems to participate in demand-response programs and markets



## **Mercury will:**

Develop a certification

Establish technical guidelines for functionality to support grid services

Foster collaboration

Promote consumer participation in demand flexibility



**Mercury will not:**





## Utilities

## Founding Members

## Manufacturers



## Tech Providers

## Research Organizations





# **Scaling Demand Flexibility and VPPs**

## **#3. Develop a customer-centric approach**



Customer

Control Room

# There are various well-documented lessons from VPP providers regarding customer engagement...

## 30 STRATEGIES OF LARGE VPP PROGRAMS

### 30 Strategies: Categories, relative feasibility, and impact

#### Marketing

- 1 Concisely message program benefits
- 2 Mention multiple motivators for participation
- 3 Deploy top-of-funnel marketing
- 4 Host in-person promotional events

#### Enrollment Process

- 5 Create a seamless enrollment process
- 6 Pre-enroll devices sold on utility marketplaces
- 7 Offer point-of-sale enrollment at retailers
- 8 Offer easy enrollment in multiple programs
- 9 Integrate value-add services into programs
- 10 Provide referral incentives

#### Ecosystem Partners

- 11 Harmonize messaging from utilities and OEMs
- 12 Engage customers through trusted entity
- 13 Partner with local installers
- 14 Exchange learnings with other utilities

#### Incentive Design

- 15 Maximize the financial incentive
- 16 Ensure customer pays a portion of device cost
- 17 Offer ongoing participation payments
- 18 Bundle device financing options with programs
- 19 Align price signals
- 20 Offer active and passive control models

#### Engagement and Retention

- 21 Improve program design over time
- 22 Regularly remind customers of their rewards
- 23 Compensate through channels customer will notice
- 24 Communicate societal impact of participation
- 25 Call regular testing events
- 26 Offer easy unenrollment
- 27 Offer flexibility to opt out of events
- 28 Limit event notifications in automated programs
- 29 Allow customers to set control range
- 30 Offer technology choice where available

### 30 Strategies: Impact and Ease of Implementation Based on perspectives of VPP solutions providers



Note: The feasibility and impact scores for Strategy 18 reflect the views of the authors because it was not included in the survey.

# Spotlight on incentive design: things to consider

- Start simple, grow the customer base, and evolve the product over time
- At the outset, incentives might be different for different customer segments or assets
- Consider incentives for customers with and w/o smart meter
- Evolve from off-bill incentives/simple credits to dynamic retail pricing that is DER-agnostic
- There are always PROs and CONs...!



## The offering should be:

1. Competitive
2. Attractive & Beneficial for the customer
3. Beneficial to the utility (eventually)
4. Incentivize the right customer behavior

# Compensation models for load flexibility

*Low complexity*



Type	Example
device-specific enrollment-based off-bill payment	\$20 gift card for enrolling your thermostat, mailed once per year
device-specific enrollment-based bill credit	\$20 credit applied annually on Oct bill for customers with enrolled thermostats
device-specific performance-based bill credit	\$10/kW-yr for thermostat-based load reduction, applied on Oct bill
device-specific retail rate with time-varying component	TOU rate for EVs
device-agnostic retail rate with time-varying component	whole-home TOU rate
device-agnostic retail rate with time- AND location - varying components	whole-home TOU rate with locational pricing overlay

*High complexity*

# Incentivization | Examples & case studies

**Client #1** - credit \$30/month for every 5 smart charges 💰

## Pros

Low effort  
Great for Alpha/Beta testing

## Cons

Less scalable  
Less of a driver for behavioural change

**Client #2** - \$30 discount applied via electricity statement each month (EV) 🏠

## Pros

Low effort  
Can be an add on  
Easy to understand

## Cons

Less of a driver for behavioural change

**Client #3** - credit \$10 each month for being on the tariff 💰

## Pros

Low effort  
Great for Alpha/Beta testing

## Cons

Less scalable  
Less of a driver for behavioural change

**Client #4** - dynamic time of use (7.5¢/kWh 12am - 5am, and all smart charging) ⌚

## Pros

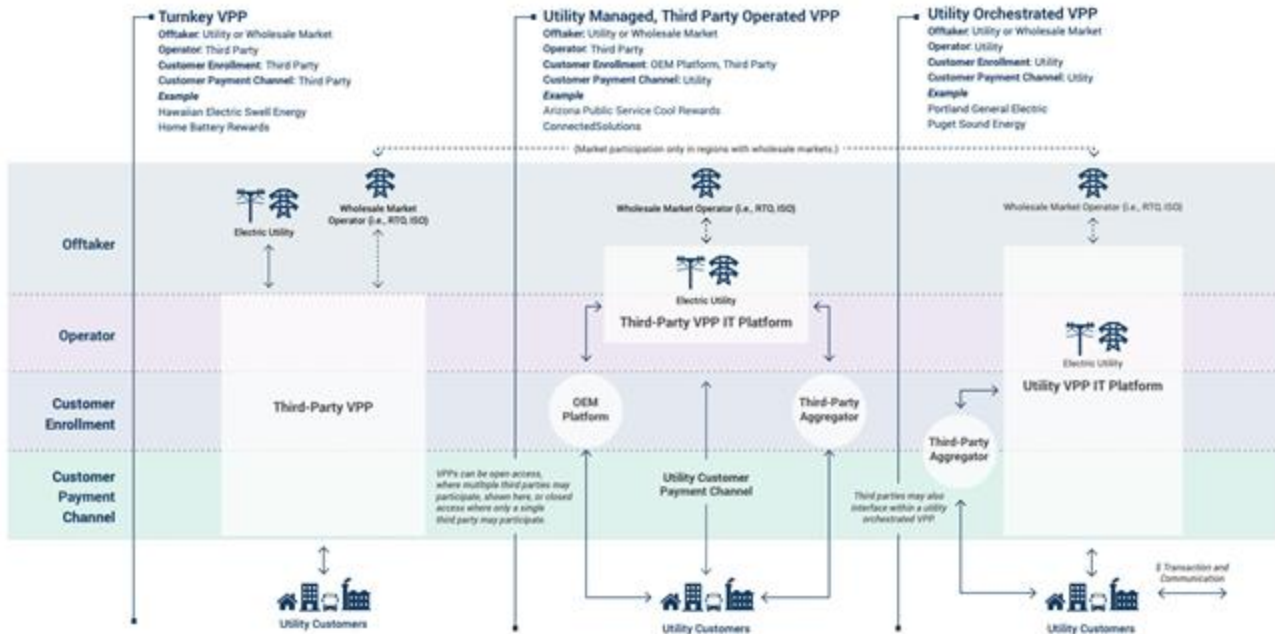
Offers low rates  
Drives changes to behaviour

## Cons

Technically complex  
Hard to explain to customers

# Utility Participation Model – dictates who owns the customer relationship for flex services

## Example VPP Utility Participation Models\*



\*The models and roles shown are representative and not exhaustive. Individual VPP features add more details to the structure and operations for each VPP. In addition to the models described above, some third parties have VPP programs that participate directly in wholesale markets. In this model, a utility may not hold any of the above roles, but may require visibility for management of distribution system impacts. This framework has been adapted from the DOE Pathways to VPP Commercial Liftoff Report.



# Thank you



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[emma.rodvien@kraken.tech](mailto:emma.rodvien@kraken.tech)

