



Stakeholder Comments Template

Energy Storage and Distributed Energy Resources Phase 4

This template has been created for submission of stakeholder comments on the Draft Final Proposal and associated May 27 meeting discussions, for the Energy Storage and Distributed Energy Resources (ESDER) Phase 4 initiative. The paper, stakeholder meeting presentation, and all information related to this initiative is located on the [initiative webpage](#).

Upon completion of this template, please submit it to initiativecomments@caiso.com.
Submissions are requested by close of business June 10, 2020.

Submitted by	Organization	Date Submitted
Michael Kramek Michael.kramek@betm.com	Boston Energy Trading and Marketing	June 10, 2020

Please provide your organization's general comments on the following issues and answers to specific requests.

1. Default Energy Bid for Storage Resources

Please provide your organization's feedback on the default energy bid proposal for storage resources, as described within the draft final proposal and discussed during the May 27 stakeholder meeting.

As stated previously Boston Energy is generally supportive of the ISO developing a default energy bid structure for energy storage resources that accurately incorporate all costs incurred by storage resources. We continue to believe that ISO's proposal is premature at this point given the limited number of storage resources participating in the market.

2. End-of-Hour Charge Parameter(s)

Please provide your organization's feedback on the end-of-hour charge parameter(s) proposal, as described within the draft final proposal and discussed during the May 27 stakeholder meeting.

Boston Energy has been supportive of the ISO's approach to implementing an optional end of hour state or charge parameter since it was first discussed in 2019. The development of this parameter has been a collaborative effort between stakeholders and the ISO from the very beginning. Unfortunately, that collaboration seems to have ended with the publication of the draft final proposal. The ISO has added, at the last minute,

vague language indicating that RA resource will not be able to utilize this end of hour parameter. This is because, as the ISO explained on the working group call, in order to use the parameter the storage resource must have at a minimum and maximum SOC range of at least 4 times its RA value. Given that 90+% of storage resources are RA resource this means in practice the ISO is developing a solution that nobody will be able to utilize. This last-minute change is very disappointing and seems to discount all the hard work and effort put in by stakeholders to develop a state of charge parameter. Boston Energy requests the ISO reconsider its proposal to restrict the use of this parameter to essentially non-RA storage resources only.

If the ISO insists on keeping this requirement in the proposal, then Boston Energy suggest removing the feature from the proposal all together. We see no sense of wasting time and energy on a market feature that nobody will be able to use.

3. **Variable-Output DR**

Please provide your organization's feedback on variable-output DR, as described within the draft final proposal and in the ELCC study discussed during the May 27 stakeholder meeting. Please explain your rationale and include examples if applicable.

Boston Energy has no comments at this time.

4. **Additional comments**

Please offer any other feedback your organization would like to provide from the straw proposal and topics discussed during the web meeting.

Boston Energy has no additional comments at this time.