

Comments of Boston Energy Trading and Marketing on CAISO's Excess Behind the Meter Production Straw Proposal

Boston Energy Trading and Marketing ("Boston Energy") appreciates the opportunity to provide comments on the CAISO's Excess Behind the Meter Solar Production straw proposal issued on September 5, 2018. Boston Energy is generally supportive of the ISO's proposal but seeks the following clarifications in the final proposal.

Establish how excess behind the meter production will be reported and settled

The straw proposal outlines how excess behind the meter production will be treated by the ISO. In the straw proposal the ISO proposes that excess behind the meter production will be reported and settled as negative load. It will be paid at the locational prices where the data is being submitted.

Boston Energy seeks clarification on what the CAISO means by "paid at the location where the data is being submitted"? Does the ISO intend to create a nodal pricing point for each location where excess behind the meter production is reported or does the ISO intend to settle the excess production at a DLAP price?

Proposal Impacts on Behind the Meter Storage Resources

Boston Energy strongly supports the ISO's efforts to expand energy and ancillary service market participation from behind the meter resources such as energy storage. We ask the CAISO per diligence to ensure this proposal does not negatively impact behind the meter storage resources; in particular projects that chose to participate under the ISO Non-Generator Resource (NGR) model. BTM NGR resources that have the ability to deliver energy or regulation service to the grid shouldn't automatically be treated as excess production. Behind the Meter NGR resources require metering and telemetry equipment identical to in-front of the meter resources and as such need to be treated in a consistent manner for market dispatch, pricing, and settlements.

Submitted by,

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