



Stakeholder Comments Template

Energy Storage and Distributed Energy Resources Phase 3

This template has been created for submission of stakeholder comments on the Draft Final Proposal of ESDER 3 that was published on July 11, 2018. The Draft Final Proposal, Stakeholder Meeting presentation, and other information related to this initiative may be found on the initiative webpage at: [ESDER Webpage](#)

Upon completion of this template, please submit it to initiativecomments@caiso.com.

Submissions are requested by close of business on **July 27, 2018**.

Submitted by	Organization	Date Submitted
Deane Burk, Deane.Burk@water.ca.gov ; Rodrigo Avalos, Rodrigo.Avalos@water.ca.gov	California Department of Water Resources (CDWR)	7/27/2018

Please provide your organization's comments on the following issues and questions.

1. Bidding and real-time dispatch options for Demand Response

CDWR would like the CAISO to also consider offering to Participating Load (PL) the proposed hourly block and 15-minute bidding options that are being made available to PDRs and the load consumption aspect of the new PDR-LSR model in the draft final proposal of ESDER Phase 3. More specifically, CDWR supports exploration of real-time market economic bids that will allow PL to be dispatched in hourly blocks or 15-minute increments to increase or decrease energy consumption in preset MW increments. CDWR believes there are times that CDWR can offer some of its pumping load to the CAISO market to help with oversupply and Flex Alert conditions. This functionality will also allow CDWR to better manage its imbalance energy. Currently in the real-time market, CDWR's participating load resources are only allowed to bid energy to decrease consumption (curtailment) and to bid non-spin reserve. CDWR believes that enhancing the abilities for PDRs to participate in the CAISO markets can be extended to PL.

CDWR believes that the functionality it seeks for its PLs is similar to the new functionality being proposed for PDRs in phase three of this initiative. Therefore, many of the same design elements can be reused. CDWR looks forward to exploring these new PL bidding options in the ESDER initiative.

- 2. Removal of the single load serving entity aggregation requirement and the application of a default load adjustment**
- 3. Load shift product for behind the meter storage**
- 4. Measurement of behind the meter electric vehicle supply equipment (EVSE) load curtailment**
- 5. Additional comments**