



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
Melanie Gillette Senior Policy Director 916-671-2456	California Efficiency + Demand Management Council (Council)	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

Please state your organization's position as described in the Draft Final Proposal:
(Support, support with caveats or oppose)

*The Council **supports** CAISO's proposal to offer a variant of the intertie bidding option to Proxy Demand Response (PDR) resources. The proposal is a significant improvement as PDRs would have longer notification times and extended real-time dispatch intervals. This should allow PDRs a real opportunity to participate in the real-time market. We applaud CAISO for recognizing the need to leverage existing market functionality to enable demand response to participate more effectively in the market.*

2. Removal of the single load serving entity aggregation requirement and the application of a default load adjustment

Please state your organization's position as described in the Draft Final Proposal:
(Support, support with caveats or oppose)

*The Council **supports** and appreciates CAISO's proposal to remove both the default load adjustment and the single LSE requirement to allow aggregators to form demand response aggregations across bundled, unbundled and community choice*

aggregation. The single LSE requirement has resulted in significant instances of stranded customers and has caused mismatches in reporting in supply plans and actual delivery month resource compositions due to customer migration.

It has been very helpful to see the results of CAISO's analysis of the total default load adjustment affected MWs and the conclusion that removing the DLA results in de minimis settlement impacts. The Council supports CAISO's proposal, including the proposal to utilize the NBT threshold price to screen submitted bids from PDR resources and only accept bids above the established NBT threshold price.

3. Load shift product for behind the meter storage

Please state your organization's position as described in the Draft Final Proposal: (Support, support with caveats or oppose)

*The Council **supports** the load shift product for behind the meter storage. However, we were among the parties who advocated for allowing additional resources to participate as load shift. We will continue to advocate for that both at CAISO and as part of the CPUC's Load Shift Working Group.*

4. Measurement of behind the meter electric vehicle supply equipment (EVSE) load curtailment

Please state your organization's position as described in the Draft Final Proposal: (Support, support with caveats or oppose)

*The Council **supports** measurement of behind the meter EVSE load curtailment for the purposes of participating in PDR. We believe that this will be relatively straightforward for CAISO to implement since the MGO framework is already in place, and this issue also fits well within California's broader greenhouse gas policy imperatives and continues CAISO's own process to maximize the value of distributed energy resources, including sources of flexible consumption. The Council appreciates CAISO's willingness to continue to explore and better understand submetered load capabilities and the potential for under valuation of their contribution to a facility's performance utilizing current baseline methodologies.*

5. Additional comments

Please offer any other feedback your organization would like to provide on the Draft Final Proposal