



## Stakeholder Comments Template

### Energy Storage and Distributed Energy Resources (ESDER) Phase 4

This template has been created for submission of stakeholder comments on the Straw Proposal Working Group Meeting for ESDER Phase 4 that was held on August 21, 2019. 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](mailto:initiativecomments@caiso.com). Submissions are requested by close of business **September 4, 2019**.

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

**1. Discussion on non-24x7 settlement of BTM Resources**

*Which areas will require the local regulatory authority to change its rules or provide clarification to load serving entities?*

**2. Market Power Mitigation for energy storage resources**

*The two options proposed in the calculation of cycling costs.*

**3. Variable Output Demand Response resources**

Please see the comments CLECA previously provided on the issue of variable output demand response in the [ESDER4](#) initiative and the application of effective load carrying capability to demand response in the [Resource Adequacy Enhancements](#) initiative.

**4. Additional comments**

Please offer any other feedback your organization would like to provide from the topics discussed during the working group meeting.