

Stakeholder Comments Template

Energy Storage and Distributed Energy Resources (“ESDER”) Stakeholder Initiative

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the Energy Storage and Distributed Energy Resources (ESDER) stakeholder initiative Revised Draft Final Proposal posted on 12/23/15 and as supplemented by the presentation materials and discussion during the stakeholder web conference held on 01/07/16.

Submit comments to InitiativeComments@caiso.com

Comments are due January 14, 2016 by 5:00pm

The 12/23/15 ESDER Revised Draft Final Proposal may be found at:

<http://www.caiso.com/Documents/RevisedDraftFinalProposal-EnergyStorageDistributedEnergyResources.pdf>

The presentation materials discussed during the 01/07/16 stakeholder web conference may be found at:

CAISO Revised Agenda and Presentation:

http://www.caiso.com/Documents/Agenda_Presentation-EnergyStorageDistributedEnergyResources010616.pdf

SCE Proposed Modification to the MGO proposal:

<http://www.caiso.com/Documents/SCEProposedModificationtoMeterConfigurationB2.pdf>

Instructions:

Listed in the following table (see first column) are the ESDER proposals requiring tariff changes and ISO Board approval (specifically two NGR enhancements plus the MGO proposal), as well as the proposal to support use of statistical sampling which does not. Please fill in the necessary information (see second and third columns) to indicate your organization’s overall level of

support for each proposal. To indicate level of support, please select one of the following options: (1) Fully support; (2) Support with qualification; or, (3) Oppose. Please provide an explanation of your organization's position in the comments column. If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

Proposal		Overall Level of Support (Fully Support; Support With Qualification; or, Oppose)	Comments (Explain position)
Allow an NGR resource to provide its initial state of charge (SOC) as a bid parameter in the day-ahead market.		No position.	
Allow an NGR resource the option to not provide energy limits or have the ISO co-optimize an NGR based on the SOC.		No position.	
Allow a PDR/RDRR resource the option of a performance evaluation methodology based on Metering Generator Output ("MGO") concepts.	As proposed.	Support with qualification.	<p>CLECA acknowledges that there are jurisdictional issues that must be resolved regarding submetering for MGO and that site boundary metering is not likely to provide as good a baseline as the configurations with submetering. Nonetheless, CLECA believes that some action on MGO, however imperfect, is better than none at this time, as long as there is protection for retail customers through the adjustment for retail usage of the BTM resource through the proposed G_{LM} adjustment. Thus the option to submeter one BTM resource should be pursued, subject to any LRA issues, and the option to submeter load and other resources can be considered in the future.</p> <p>CLECA understands the concerns raised about the non-export and non-negativity constraints and understands that these are a result of the nature of PDR/RDRR, which were conceived as load reductions and thus not involving any export to the grid. A two-way product that would allow for export that is viable for distributed resources should be addressed in a later phase of ESDER or through the creation of a more user-friendly NGR.</p>
	With modification proposed by SCE.	Support with qualification.	<p>CLECA understands that the intent of SCE's proposal is to change the definition of an event day, so that there is a greater chance of having sufficient non-event days to perform the G_{LM} calculation, in order to assure the resource is providing incremental value to the CAISO. CLECA is generally supportive of this intention and can accept this approach on an interim basis as the larger policy issues are considered going forward.</p>

Proposal to support use of statistical sampling	Fully support.	A statistical sampling baseline option is essential to development of PDR or RDRR resources that involve large numbers of customers with very similar usage patterns. It is also essential to create such a resource where there is insufficient RQMD across all participants in that resource. This is true both for customers who do not have 15-minute RQMD but who wish to participate in the real-time and ancillary services markets and for customer aggregations where not all customers have readily available 60-minute RQMD.
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