

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your written comments on the ESDER Phase 3 Straw Proposal discussion during the March 29, 2018 technical working group.



Submit comments to InitiativeComments@CAISO.com

Comments are due April 9, 2018 by 5:00pm Pacific Time

The CAISO held a Technical Working Group on March 29, 2018. The presentation and all supporting documents can be found on the [ESDER 3](#) webpage. The CAISO requests your comments to the two specific items that were presented in the working group meeting:

1. Measurement of EVSE Performance

In addition to the overall design elements of the EVSE measurement, please provide comments to the specific questions below:

- Does the current CAISO “Metering BPM Appendix G” requirements apply to EVSEs?

The current CAISO Metering BPM Appendix G requires the collection of kVARh that is not used for settlement purposes for PDR nor RDRR and is not delivered to the CAISO. As the very least, Appendix G should be modified to remove that requirement for these two resource types. Olivine also questions the requirement for 3-phase metering which may only be reasonable for installations of commercial charging banks.

- Does the 10-in-10 customer baseline methodology capture an EVSE performance, or does the CAISO need to consider another baseline?

When a sufficiently large number of EVSE are aggregated, then the baseline methodologies in place (and coming out of ESDER Phase 2) provide a reasonable methodology.

- If the load point adjustment is not applied, is there another adjustment that should be considered?

No.

Olivine continues to seek an understanding of why the CAISO is focusing on EVSE only instead of more broadly allowing sub-metering for any dispatchable load that can be accurately measured. It would be helpful if the CAISO would provide some background on this rationale preferably with data that supports not only why EVSE can benefit from this special treatment but also why other technologies should not benefit.

2. Load Shift Product

In addition to providing comments on the overall design elements of the Load Shift Product, please provide comments to the specific topics/questions below:

- Please comment on the CAISO's proposal to establish two resource IDs and the bidding requirements for the load curtailment and consumption.

Olivine is strongly against this approach. While we understand the rationale for the CAISO in terms of minimal impact to their systems, we view it as short sighted for the following reasons:

1. By definition the "load shift" construct is an application of flexible demand that can increase or decrease consumption and is, as such, a single resource. Splitting it into two greatly reduces (or eliminates) the opportunity for energy management (SOC or otherwise) or even verification of actual load shift (versus simple consumption). Granted, the CAISO has articulated that the "load shift product will not be optimized across positive and negative generation". While that may be a useful phase 1 approach, splitting the resource IDs effectively makes that permanent.
2. Splitting such a resource in two will require third parties to enhance systems for a fairly unusual use case: two resources representing the same customers. Alternatively, the CAISO could implement bi-directional bidding – as will be supported for the PG&E Excess Supply Pilot (XSP) in 2018 – which provides a seeming more rationale view for an ISO resource type. Note that previously, the PG&E Supply Side Pilot and XSP originally followed this intended approach of the CAISO (i.e., two resources) and found it cumbersome for participants to manage two separate resources for nomination, bidding, awards, dispatch and settlements. This is a primary driver for combining the two constructs in 2018.

It appears that the CAISO is developing a new resource type altogether for consumption only. If a new resource type is necessary (i.e., not just an augmentation of PDR), then we strongly suggest that this resource provide both consumption and reduction and be inverted to represent load, not generation. There are advantages to this – for example, potentially eliminating the 10 MW energy telemetry requirement that is a relic of conventional generation – and it also gets us away from confounding definitions, such as: “Load consumption = Negative Generation”. The result could be a third-party friendly flexible demand response product that allows for reduction and consumption without being beholden to a dated resource model.

As such, Olivine strongly recommends taking a longer view to implement an actual shifting product – not just a consumption product – with a robust feature set instead of what appears to be an expeditious solution.

- Please provide comments on the Metered Energy Consumption (MEC) methodology
 - The CAISO presented an example that measured typical use with consideration of only the load consumption in “non-event hours” during the 10-in-10 baseline calculation and an example that considered both load curtailment and consumption; please comment on either calculation.
 - Are there other calculations that could measure typical use?

Comments:

Olivine is generally supportive of the MEC methodology; however, we look forward to seeing a written explanation of the complete calculation methodology.

3. Other comments

Please provide any additional comments not associated with the topics above.

Comments: