



## Stakeholder Comments Template

### Excess Behind the Meter Production: Straw Proposal

This template has been created for submission of stakeholder comments on the **Excess Behind the Meter Production: Revised Straw Proposal** that was published on **November 5, 2019**. The presentation and all related information for this initiative may be found on the initiative webpage at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/ExcessBehindTheMeterProduction.aspx>.

Submitted by	Organization	Date Submitted
Brenda Prokop <a href="mailto:bprokop@itctransco.com">bprokop@itctransco.com</a> 216-577-1464	ITC Grid Development, LLC	11/27/2018

Upon completion, please submit this template to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com) by end of day **November 27, 2018**.

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

#### 1) **Gross Load tariff definition clarification**

Please state your organization's position on the **Gross Load tariff definition clarification** as described within the **Revised Straw Proposal**: (Support / Support with Caveat / Oppose)

ITC supports the Gross Load tariff definition clarification in the Revised Straw Proposal, which will help to ensure standard treatment, reporting practices and settlement of output from behind-the-meter resources.

If you replied supports with caveats or opposes, please further explain your position and include examples:

#### 2) **Excess Behind the Meter Production tariff definition**

Please state your organization's position on the **Excess Behind the Meter Production tariff definition**, as described in the **Revised Straw Proposal**: (Support / Support with Caveat / Oppose)

ITC supports clarification of the Excess Behind the Meter Production definition in the CAISO tariff, as reflected in the Revised Straw Proposal. As indicated in the response to #1, this will assist in standardizing reporting practices and settlement of production from behind-the-meter resources.

If you replied supports with caveats or opposes, please further explain your position and include examples:

### 3) **Excess behind-the-meter production reporting and settlements**

Please state your organization's position on the **Excess Behind the Meter Production reporting and settlements**, including the proposal to update the current **Unaccounted-for-Energy (UFE) determination**, as described in the **Revised Straw Proposal**: (Support / Support with Caveat / Oppose)

ITC supports the standardization of Excess Behind-the-Meter Production reporting and settlement in the CAISO, as reflected in the Revised Straw Proposal.

If you support with caveat or oppose, please further explain your position and include examples:

### 4) **Amended charge codes allocated based on gross load**

Please state your organization's position on the **Excess Behind the Meter Production charge codes related to reliability (rather than energy), for allocation based on gross load**, as described in the **Revised Straw Proposal**: (Support / Support with Caveat / Oppose)

ITC supports with caveat the charge codes related to reliability for allocation based on gross load, as reflected in the Revised Straw Proposal.

If you support with caveat or oppose, please further explain your position and include examples:

ITC has not specifically reviewed the purpose of each CAISO charge code and agreed or confirmed that each such charge code relates to an energy-related item; or alternatively, a reliability-driven item that should be allocated based on Gross Load. However, we agree that the charge codes in the list provided are generally reliability-related charges that would appropriately be allocated based on demand, and per the CAISO's proposed tariff definitions and settlement procedures in the Revised Straw Proposal, should be allocated based on Gross Load.

**5) Application of losses**

Please state your organization's position on the **Excess Behind the Meter Production application of losses**, as described in the **Revised Straw Proposal**: (Support / Support with Caveat / Oppose)

ITC neither supports nor opposes the application of losses outlined in the Revised Straw Proposal.

If you support with caveat or oppose, please further explain your position and include examples:

**Additional comments**

Please offer any other feedback your organization would like to provide on the **Excess Behind the Meter Production: Revised Straw Proposal**.