Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the discussion from the Energy Storage and Distributed Energy Resources Phase 3 stakeholder call at the California ISO on October 12, 2017.

Submit comments to initiativecomments@CAISO.com

Comments are due October 18, 2017 by 5:00pm Pacific time

California ISO

Please provide your comments on the topics listed below from the Issue Paper presentation discussed during the October 12 stakeholder call, as well as any additional comments you wish to provide using this template.

1. Please provide comments on whether your organization supports or opposes the Demand Response proposal item, as well as the reasons why.

NRG supports prioritizing and moving forward with the following proposed Demand Response ("DR") issues in the ESDER 3 initiative:

- 3.1.1 Demand Response modeling limitations
- 3.1.3 Resource design constraints
- 3.1.4 Demand Response aggregations rules

NRG supports moving forward with these issues because they have the broadest applicability to DR providers.

2. Please provide comments on whether your organization supports or opposes the Multiple-Use Applications proposal item, as well as the reasons why.

NRG supports prioritizing and moving forward with the following proposed Multiple Use Application issue in the ESDER 3 initiative:

- 4.1.1 Relaxing the 24 x 7 participation rule for NGRs

NRG supports moving forward with this issue because of the significant amount of stakeholder support for considering this issue in earlier phases of the ESDER initiative.

3. Please provide comments on whether your organization supports or opposes the Non-Generator Resource proposal item, as well as the reasons why.

NRG supports prioritizing and moving forward with the following proposed Non-Generator Resource Issues in the ESDER 3 initiative:

- 5.1.1 Reflecting costs and NGR use limitations
- 5.1.2 Market Mechanisms for managing SOC and throughput limitations to facilitate Multi-Use Applications

NRG supports moving forward with both of these issues because of the increasing penetration of IFOM storage and the important nexus between managing the state of charge and the ability for storage resources to provide multiple services.

4. Please provide additional comments, if any, from the discussion.

The CAISO's position that it will emphasize its focus on a "load shift" product instead of a "load consumption" product in ESDER 3 has important ramifications for the nature and design of this product.   NRG looks forward to the ESDER 3 conversation around the new direction for this product.