



Comments of OhmConnect, Inc.
Energy Storage and Distributed Energy Resources Phase 3
Revised Straw Proposal

Submitted by	Company	Date Submitted
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OhmConnect, Inc. (OhmConnect) respectfully submits the following comments in the stakeholder process for the California Independent System Operator’s (CAISO) Energy Storage and Distributed Energy Resources (ESDER) Phase 3 initiative April 30, 2018 Revised Straw Proposal.

OhmConnect broadly supports the four areas of demand response enhancements the CAISO has determined to be within the scope of the ESDER 3 initiative, and in these short comments we simply note an apparent discrepancy between this initiative and the CAISO’s contemporaneous Day-Ahead Market Enhancements (DAME) initiative. Specifically, whereas in the ESDER 3 initiative the CAISO is proposing to allow block hourly bidding for PDRs in the RTM, in the DAME initiative the CAISO has indicated that “[b]lock hourly bidding [in the DAM] is only applicable for intertie bids and RDRR selecting the hourly scheduling option”.¹ In OhmConnect’s judgment, PDRs that use block hourly bidding in the RTM should also be allowed (if not required) to use block hourly bidding in the DAM. We therefore request that the CAISO provide this clarification in its subsequent ESDER 3 and DAME proposals.

¹ See April 11, 2018 CAISO *Day Ahead Market Enhancements Revised Straw Proposal*, accessible at <http://www.caiso.com/Documents/RevisedStrawProposal-DayAheadMarketEnhancements.pdf>.