



Excess Behind the Meter Production: Draft Final Proposal

Submitted by	Organization	Date Submitted
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1) **Gross Load tariff definition clarification**

PG&E reiterates its support of CAISO's proposed Gross Load tariff definition change that clarifies that Excess BTM Production (EBTMP) should not be netted from Gross Load. PG&E also supports the removal of the initial clause stating that Gross Load is used for the purposes of calculating TAC. PG&E agrees with CAISO that all reliability-related charges should be allocated via Gross Load.

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

PG&E reiterates its support of CAISO's definition of Excess Behind the Meter Production. This definition is necessary to properly differentiate between Gross Load, which does not net EBTMP, and "Net Load", which would be Gross Load minus EBTMP.

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

PG&E reiterates its support of CAISO's update to Excess Behind the Meter Production reporting and settlements section. PG&E believes the updated determination for Unaccounted for Energy (UFE) is appropriate given the updated tariff definition of Gross Load and EBTMP.

4) **Unaccounted-for-Energy (UFE) determination**

PG&E reiterates its support of the updated determination for Unaccounted for Energy (UFE) that incorporates the new Gross Load and EBTMP definitions.

5) **Application of losses**

PG&E continues to believe that the application of losses deserves more discussion and consideration. The instances when EBTMP is not offsetting energy from transmission-connected generation is increasing, and we need policies that accurately accommodates an evolving two-way electrical grid. PG&E recommends that CAISO continues to address the application of losses in a more comprehensive manner in a

new initiative.

Additional comments

PG&E recommends that CAISO provide clear examples for how scheduling coordinators should aggregate meter readings to report their Gross Load and Excess BTM at its respective Default Load Aggregation Point (DLAP) or Custom Load Aggregation Point (CLAP). This doesn't have to be explicitly outlined in the tariff but should at least be in the Business Practice Manual (BPM) to ensure clear understanding and consistent practice amongst all stakeholders.