

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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The CAISO posted the ESDER 3 Revised Straw Proposal on April 30, 2018, followed by a web conference on May 10, 2018. The presentation and all supporting documents can be found on the [ESDER 3](#) webpage. The CAISO requests your comments to the ESDER3 proposal:

1. Demand Response

- New bidding and real-time dispatch options for demand response (DR)
- Removal of the single load serving entity (LSE) aggregation requirement and the need for application of a default load adjustment (DLA)
- PDR-Load Shift Resource
- Measurement of behind the meter electric vehicle supply equipment (EVSE) load curtailment

Comments:

PDR Load Shift Resource

CAISO proposes to include the whole-premise load (including the storage) for load curtailment resource ID, while the load consumption product only measures the load of the storage.¹ PG&E recommends subtracting the measurement of the storage from the load curtailment resource, if the participant participates in both PDR and PDR-LSR, to keep the two products separate in the performance baseline calculation.

Measurement of behind the meter electric vehicle supply equipment (EVSE) load curtailment:

PG&E recommends the CPUC and CAISO collaborate on what additional rules are needed, or need to be modified to enable EVSE participation. For example, the CAISO should investigate potential conflicts with the CAISO’s proposal and the CPUC’s Rule 24. CPUC’s Rule 24 governs aspects of DR related to roles and responsibilities of different entities, provides customer protection, and importantly specifies meter data access requirements. PG&E interprets Rule 24 as having provisions which would prohibit EVSEs that are sub-metered from participating in a separate DRP. Rule 24, Section C.6. Split Loads Not Allowed states, “*Customers requesting DRP DR Service may not partition the electric loads of a service account among different DRPs at any*

¹ Figure 8, page 21: <https://www.caiso.com/Documents/RevisedStrawProposal-EnergyStorage-DistributedEnergyResourcesPhase3.pdf>

one time. The entire load and load reduction for a service account can be registered in the CAISO's DRS to only one DRP at any one time."² This implies two possible conflicts with CAISO's current proposal:

- An EVSE would not be able to participate as a sub-metered DR resource if the premise was already participating in a DR program under a different DRP.
- The EVSE can only participate as a sub-metered DR resource if the premise elected to not participate as a DR resource.

2. Multiple-Use Applications

- The CAISO, in its Revised Straw Proposal, has not identified additional topics at this time, but will reevaluate once the draft report under the CPUC MUA working group is complete.

Comments: None.

3. Non-Generator Resource

- The CAISO proposes to develop a process to define use-limited status for NGRs.
 - What are the potential use-limited qualifying factors and types of documents to qualify use-limitation?

Comments: None.

4. Additional workshop needed

- What topics would stakeholders want to discuss if the CAISO holds a workshop?

Comments:

PG&E recommends a working group meet to further discuss the implementation details associated with the impact a BTM battery providing load shift will have on baseline calculations and performance when the premise participates in DR.

² https://www.pge.com/tariffs/tm2/pdf/ELEC_RULES_24.pdf