



Stakeholder Comments Template

Excess Behind the Meter Production: Draft Final Proposal

This template has been created for submission of stakeholder comments on the **Excess Behind the Meter Production: Draft Final Proposal** that was published on **December 12, 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
<i>Bert Hansen (626) 302-3649</i>	<i>Southern California Edison ("SCE")</i>	<i>January 16, 2019</i>

Upon completion, please submit this template to initiativecomments@caiso.com by end of day **January 16, 2019**.

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 **Draft Final Proposal**: (Support / Support with Caveat / Oppose)

SCE Comment: SCE supports with caveat.

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

SCE Comment: SCE support is focused on the treatment of how Excess BTM Production affects the reporting of Gross Load for the purpose of settlements. SCE believes that this stakeholder process has made significant progress in ensuring principled and consistent treatment of Gross Load reporting.

As pointed out on page 5, the treatment of smaller POU's and MSSs is out of scope for this initiative. SCE remains concerned that there may be inconsistent reporting

of “Gross Load” by such entities, since they may not have the advanced retail metering infrastructure that the three IOUs have, and so may have to rely on larger citygate metering with exclusions for some internal generation.

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 **Draft Final Proposal**: (Support / Support with Caveat / Oppose)

SCE Comment: SCE supports.

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

SCE Comment: Not applicable.

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 **Draft Final Proposal**: (Support / Support with Caveat / Oppose)

SCE Comment: SCE supports.

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

SCE Comment: Not applicable.

4) Unaccounted-for-Energy (UFE) determination

Please state your organization’s position on the **Excess Behind the Meter Production determination for UFE**, as described in the **Draft Final Proposal**: (Support / Support with Caveat / Oppose)

SCE Comment: SCE supports.

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

SCE Comment: Not applicable.

5) Application of losses

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

SCE Comment: SCE supports.

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

SCE Comment: Not applicable.

Additional comments

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

SCE Comment: SCE believes that the proposal as described in the Draft Final Proposal regarding Gross Load, Excess BTM Production, and associated issues would greatly improve the current situation with respect to reporting of meter data, including Excess BTM Production. As noted above, it should result in a principled and consistent treatment between all market participants for the reporting of loads, the billing of charges based on Gross Load, and a recognition of the value of Excess BTM Production. SCE looks forward to the implementation of the proposal as described.