

## Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your written comments on the ESDER Phase 3 Straw Proposal.



Submit comments to [InitiativeComments@CAISO.com](mailto:InitiativeComments@CAISO.com)

**Comments are due March 7, 2018 by 5:00pm Pacific Time**

The CAISO posted the ESDER 3 Straw Proposal on February 15, 2018 followed by a web conference on February 21, 2018. The presentation and all supporting documents can be found on the [ESDER 3](#) webpage. The CAISO requests your comments to the overall proposals scoped for ESDER3 along with the following specific questions:

### 1. Demand Response

- New bidding and real-time dispatch options for demand response (DR)
  - Are there other considerations the CAISO needs to address to ensure resources can feasibly respond to dispatches in real-time?
- Removal of the single load serving entity (LSE) aggregation requirement and the need for application of a default load adjustment (DLA)
  - Is there general consensus for the removal of the DLA and including the NBT bidding rule, to enable multi-LSE aggregations?
- Load shift product for behind the meter (BTM) storage
  - Based on the product features outlined in the straw proposal, are stakeholder aware of any CPUC regulations that need to be evaluated for potential change to accommodate the proposed load shift functionality (i.e. any RA conflicts)?

- Are there other product features that should be considered within the proposal?
- Measurement of behind the meter electric vehicle supply equipment (EVSE) load curtailment
  - What additional proposal details should the working group consider and/or address as the proposal is further developed?

**Comments:**

SDG&E agrees that CCDEBE will allow DR to bid minimum load and startup costs when the Pmin is OMW. This is useful for resources such as DR to not be dispatched or awarded for OMW during the RUC process. However, given the products being contemplated under this initiative, SDG&E would recommend the CAISO to provide additional details for whether or not CCDEBE would also offer behind the meter non-generator resources (storage) the same abilities. These NGR PDRs would have a pmin lower than OMW. If the capability is not limited to DR and would also apply to NGRs, SDG&E would like to CAISO confirm that in front of the meter NGRs would also have the opportunity to reflect minimum load and start-up costs.

SDG&E believes that while load shift product for BTM storage might not qualify for RA towards local and system requirements, the load shift product should be considered for Flexible RA counting. Both consumption and “curtailment” during a discharge would reduce the net load ramp. SDG&E believes the CAISO should consider allowing these resources to provide such benefits. The CAISO’s FRACMOO 2 initiative is considering separating the bond between NQC and EFC. If successful, a load shift product should qualify for EFC value. The CAISO should also provide details for how the load shift product would be separated out from future load forecasts for RA requirements. Assuming 1000MWs of load shift resources exist in the future, would the CAISO or CEC reconstitute the historical load from the load shift products? If not, then the load would include the effects of load shifting when the BTM storage discharged and reduce the overall RA needs.

SDG&E supports the proposal to enable EVSE sub-metering and load curtailment. SDG&E recommends that the CAISO discuss the requirement to use metering data from the EVSE supplier rather than reliance on physical sub-meters. If this product is providing load curtailment, would this product provide RA unlike the load shift product? How would a supplier offer the variable load curtailment on an hourly basis? Would RAAIM apply to an inability to offer consistent MW values for curtailment throughout the day?

**2. Multiple-Use Applications**

- The CAISO proposes to perform a comprehensive review and analysis of what is needed to facilitate the rules and framework established in the MUA ruling.

**Comments:**

The CAISO's proposal for MUA is rather vague and does not provide clear direction to stakeholders. Based on the information provided at the Market Performance and Planning Forum, the final policy is expected to be completed by August 2018. This means that there are 5 months to participate in CPUC led working groups, establish CAISO working groups, perform analysis and form new proposals. SDG&E recommends the CAISO provide additional details on the milestones that are needed in order to consider and implement non-24x7 rules for NGRs under this initiative.

**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:**

[Insert comments here]

**4. Other comments**

Please provide any additional comments not associated with the topics above.

**Comments:**

SDG&E is extremely disappointed that the CAISO decided to drop better weather-sensitive DR, one of the highest ranked priorities, from the ESDER 3 scope. It appears that the CAISO continues to view this issue as a result of the QC determination rather than how the CAISO's markets are unable to allow DR providers to submit variable MW bids on an hourly basis regardless of the QC value. The inability to bid variable MWs throughout the day is creating barriers to entry of the CAISO markets for market participants. All PDRs will face this issue because the CAISO's OMS system does not allow PDRs to submit partial derates. PDRs that are not registered as use-limited resources will be required to submit bids up to their RA value 24x7. Weather-sensitive DR is just an example based on SDG&E's own DR programs. However, SDG&E is already seeing these issues being applicable to products being developed under this initiative. These issues will continue and the CAISO should resolve it now.