



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
Meg McNaul mmcnaul@thompsoncoburn.com 202.585.6940	The Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (the "Six Cities")	Jan. 16, 2019

Upon completion, please submit this template it 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)

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

The Six Cities do not oppose the proposed definition of the term "Gross Load," subject to their comments below regarding the scoping for this initiative.

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)

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

The Six Cities do not oppose the proposed definition of the term “Excess Behind the Meter Production,” subject to their comments below regarding the scoping for this initiative.

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)

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

The Six Cities do not oppose the CAISO’s proposed reporting and settlements as described in the Draft Final Proposal, subject to their comments below regarding the scoping for this initiative.

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)

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

The Six Cities do not oppose the CAISO’s proposed revisions to the determination of Unaccounted For Energy, subject to their comments below regarding the scoping for this initiative.

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)

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

The Six Cities do not oppose the CAISO’s Draft Final Proposal with respect to the application of losses, subject to their comments below regarding the scoping for this initiative.

Additional comments

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

The Six Cities continue to strongly support the CAISO's scope for this initiative, which does not include modifications to metering arrangements and settlements applicable to publicly-owned utilities and Metered Sub-Systems ("MSSs") that were negotiated and implemented prior to the CAISO's inception. Further, as discussed previously, none of the Cities presently requires the metering capability to implement the CAISO's revised definitions and separately report Excess Behind the Meter Production, and the Draft Final Proposal properly recognizes those limitations. How will this scoping limitation be documented in the tariff?