



Stakeholder Comments Template

Energy Storage and Distributed Energy Resources (ESDER) Phase 4

This template has been created for submission of stakeholder comments on the Revised Straw Proposal for ESDER Phase 4. The paper, stakeholder meeting presentation, and all information related to this initiative is located on the [initiative webpage](#).

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business **November 12, 2019**.

Submitted by	Organization	Date Submitted
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Please provide your organization's general comments on the following issues and answers to specific requests.

1. End-of hour state-of-charge proposal

Wellhead fully supports the CAISO proposal at this time

2. Discussion of end-of-day state-of-charge

Wellhead fully supports the CAISO proposal at this time

4. Market power mitigation for storage resources

In general, Wellhead supports the CAISO's proposal for market power mitigation; however, Wellhead strongly believes that the CAISO should schedule separate technical working groups to further develop the cycling costs and opportunity costs.

Quite recently Wellhead has noted an industry trend by battery manufacturers/vendors for cycle depth pricing methodologies that does not neatly align with our discussions with CAISO to date. This trend, as we understand it, is a result of robust manufacturer/vendor testing. Since participants, as the end users, must pay for augmentation based on methodologies developed by manufacturers/vendors, we believe additional discussions are necessary. We also note that SCE and Wellhead both provided alternative cycle cost methodologies which were not addressed in the latest CAISO proposal. While Wellhead does not believe that either of these alternative proposals is the right fit, it does show that we do not have consensus and that a technical working group is required.

5. Variable output demand response

No Comment

6. Parameters to reflect demand response operational characteristics

No Comment

7. Removing consideration of non-24x7 settlement of behind the meter resources under DER aggregation model

No Comment

8. Additional comments

Please offer any other feedback your organization would like to provide from the topics discussed during the working group meeting.