Stakeholder Comments Template

Energy Storage and Distributed Energy Resources ("ESDER") Stakeholder Initiative

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the Energy Storage and Distributed Energy Resources (ESDER) stakeholder initiative Revised Draft Final Proposal posted on 12/23/15 and as supplemented by the presentation materials and discussion during the stakeholder web conference held on 01/07/16.

Submit comments to InitiativeComments@caiso.com

Comments are due January 14, 2016 by 5:00pm

The 12/23/15 ESDER Revised Draft Final Proposal may be found at:
http://www.caiso.com/Documents/RevisedDraftFinalProposal-EnergyStorageDistributedEnergyResources.pdf

The presentation materials discussed during the 01/07/16 stakeholder web conference may be found at:

CAISO Revised Agenda and Presentation:
http://www.caiso.com/Documents/Agenda_Presentation-EnergyStorageDistributedEnergyResources010616.pdf

SCE Proposed Modification to the MGO proposal:
http://www.caiso.com/Documents/SCEProposedModificationtoMeterConfigurationB2.pdf

Instructions:

Listed in the following table (see first column) are the ESDER proposals requiring tariff changes and ISO Board approval (specifically two NGR enhancements plus the MGO proposal), as well as the proposal to support use of statistical sampling which does not. Please fill in the necessary information (see second and third columns) to indicate your organization's overall level of

support for each proposal. To indicate level of support, please select one of the following options: (1) Fully support; (2) Support with qualification; or, (3) Oppose. Please provide an explanation of your organization's position in the comments column. If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

Proposal		**Overall Level of Support** (Fully Support; Support With Qualification; or, Oppose)	**Comments** (Explain position)
Allow an NGR resource to provide its initial state of charge (SOC) as a bid parameter in the day-ahead market.		Fully Support	eMotorWerks appreciates these two NGR SOC modifications, which will enable EV chargers to more logically participate as NGRs. Because the energy availability of an EV charging aggregation varies throughout the day, it makes sense for the Aggregator to provide and manage its own SOC.
Allow an NGR resource the option to not provide energy limits or have the ISO co-optimize an NGR based on the SOC.		Fully Support	See comment above.
Allow a PDR/RDRR resource the option of a performance evaluation methodology based on Metering Generator Output ("MGO") concepts.	As proposed.	Support with Qualification	eMotorWerks is concerned that the CAISO does not allow load-only resources to use the B3 methodology with respect to metering and baseline calculations. The existing M meter construct for dispatchable load is deficient for resources like EV chargers, which are discreet from site loads from a dispatch perspective. Also, the existing 10 of 10 baseline methodology presents a clear market disadvantage for high-participation load-only resources, when compared to the proposed MGO baseline methodology. eMotorWerks would support the MGO proposal with a provision for load only resources to participate using the same methodology.
	With modification proposed by SCE.	Support with Qualification	SCE's proposal penalizes resources for bidding below the NBT price. If a resource bids below the NBT, its dispatch will count as "baseline" dispatch, which will reduce the apparent capacity of any future market participation by that resource. This issue should be discussed further in future ESDER phases.
Proposal to support use of statistical sampling		Fully Support	Due to the limitations on the number of meter IDs available in the DRAM and other supply side DR programs, it is critical to continue to support statistical sampling methodologies at this time.