

Comments of

on CAISO ESDER 3 Nov 6th 2017 Workshop

Submitted by	Company	Date Submitted
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The CAISO held a stakeholder workshop to find consensus on the issues and identify additional topics for ESDER 3. The presentation and all supporting documents can be found on the [ESDER3](#) webpage. **Additionally, the CAISO is considering a December 7, 2017 workshop, if needed.** Please save the date and look out for all relevant market notices.

Important: As mentioned at the November 6, 2017 workshop, the CAISO requests that stakeholders take into consideration their top priority for ESDER 3 when writing in support for a topic.

1. Demand Response

The CAISO requests stakeholders' rank and provide their justification for the following topics:

1. **Recognition of a behind the meter resource in load curtailment** - Extend the meter generator output (MGO) model to EVSEs and evaluate its applicability to other devices.
2. **Removing the single LSE requirement/ DLA discussion** - Remove the requirement of a single LSE for DR and modify use of default load adjustment (DLA)
3. **Load shift product** - Develop a load shift capability for behind the meter storage. (Currently an ESDER3 priority)
4. **Load shift product** - Evaluate all applicable load for extension of the use of a load shift product.
5. **Demand response modeling limitations**

Comments:

1. eMotorWerks presented on this topic at the workshop on behalf of the Joint EV Charging Parties and strongly supports the inclusion of this issue in scope for ESDER 3. As personal and commercial EV adoption is rapidly scaling in California, this ESDER cycle is well timed to enable demand response providers and partners to plan for maximum CAISO integration of EV charging systems. This can only occur though, to the benefit of EV owner / operators and overall system procurement costs, if EVSEs are fully enabled to deliver energy services, wherever existing across the CAISO balancing area. To do so, allowing for direct measurement of EVSE load curtailment under the PDR model is the next step that the CAISO must take. Parties were supportive of this topic, but requested potential broadening to direct measurement of other or all DERs. eMotorWerks refers to the Joint EV Charging Parties position on this possibility as well as Stem’s request to examine the 1 PDR per service account number limitation related to locations utilizing MGOM.
2. There was nearly unanimous support for this issue during the workshop. The growth of LSEs will cause this issue to increase, rather than decrease over the medium term. eMotorWerks supports the recommendation of certain parties to have the CAISO provide a report on the frequency and magnitude of DLA settlements, potentially since the beginning of supply-side integration or the DRAM 1 period. This will help to guide the discussion between parties and LSEs as to whether the DLA should be eliminated or amended, as well as whether meter data management agents will have interest in taking responsibility for calculating the LSE-specific components of a DLA.
3. & 4. eMotorWerks refers to the Joint EV Charging Parties comments on this topic. eMotorWerks is very supportive of this topic as the need to utilize flexible sources of demand to integrate increasing amounts of renewable energy should be a high priority for the CAISO. Multiple non-energy storage stakeholders at the workshop were eager to participate and ensure that a framework can be established that encourages beneficial sources of shifted consumption, which will address the concerns of CAISO staff and proceeds in parallel with rate design developments at the CPUC.
5. Based on the workshop dialog, eMotorWerks believes that stakeholder group possess several viable options to address the issue at hand. As CAISO integrated, residential demand response continues to grow from utility and non-utility sources, this issue will increase in relevance to market operations.

2. Multiple-Use Applications

1. **Relaxation of the 24x7 settlement requirement of DERs** - Create option for NGRs to opt out of ISO market participation and settlement in some intervals in order to provide services to other entities.

Comments:

1. eMotorWerks supports inclusion of this issue in ESDER 3 as it has been noted as a barrier to attracting DER market participation, especially from behind the meter, under the NGR model since DERP was established. Given the parallel proceeding at the CPUC on Multiple-Use Applications, the timing is well suited for the CAISO to also refine its market model.

3. Non-Generator Resource

1. **Double Payment for Energy Consumption by Behind the Meter NGRs.** (*additional topic for consideration*)

Comments:

1. eMotorWerks resubmits the salient point of its comments in both ESDER 2 and now ESDER 3 that Behind the Meter NGRs are not likely to participate at the CAISO at scale until rule modifications are made. The 24 x 7 participation relaxation may improve the situation, especially for bidirectional resources; however, for consuming DERs, the issue of double procurement and double payment of electricity demand is particularly problematic. eMotorWerks encourages CAISO Staff to propose a market-wide mechanism by which DERPs and LSEs can better coordinate the BTM electricity consumption by DERs in a DERA.