

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the Commission’s Own Motion to improve distribution level interconnection rules and regulations for certain classes of electric generators and electric storage resources.

Rulemaking 11-09-011  
(Filed April 7, 2021)

**COMMENTS OF  
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

**I. Introduction**

The California Independent System Operator Corporation (“CAISO”) provides comments supporting Administrative Law Judge Hymes’ *Proposed Decision Adopting Additional Safety Requirements to Address Load Masking* (“PD”), issued on May 4, 2023.

**II. Comments**

The CAISO strongly supports the PD, which directs the investor owned utilities (“IOUs”) to provide to the CAISO the telemetry data currently required by Rule 21. The CAISO agrees that sharing telemetry data will help mitigate safety and reliability risks on the transmission and distribution systems and negative impacts on the wholesale markets.<sup>1</sup>

First, the CAISO supports the PD’s revised description of “load masking,” which now: (1) describes how load masking can inhibit the ability to plan and operate the distribution *and transmission system*; (2) includes export *and non-export* facilities as

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<sup>1</sup> PD at 1.

causes; and (3) describes how load masking can inhibit the operation of the grid *and negatively impact the wholesale markets*.<sup>2</sup> These are critical revisions that accurately capture the causes and effects of load-masking.

Second, the CAISO supports the PD’s direction to require that IOUs share telemetry data with CAISO for non-export facilities.<sup>3</sup> Directing the IOUs to share with the CAISO the telemetry data currently required by Rule 21 for non-export generating facilities interconnecting to the transmission system will help mitigate the impacts of load-masking on grid operations, short term demand forecasting, and the wholesale markets.

Finally, the CAISO continues to emphasize the importance of considering data needs for both distribution- and transmission connected resources to support reliable grid operation and planning. Resources that are not visible to the CAISO—including distribution-connected resources (“DERs”) and aggregations of smaller DERs—ultimately have the same impacts on the CAISO’s demand forecasting and operations as large, transmission-connected assets. Increased visibility of these DERs will be essential to ensure the accuracy of CAISO’s demand forecasting tools. The CAISO understands that other Commission proceedings such as R.22-11-013 and R.21-06-017 may be more appropriate venues for enhancements in DER data collection, reporting, and access beyond the larger, transmission-connected DERs considered in this proceeding.<sup>4</sup> The CAISO will continue to work with the Commission and parties in those proceedings.

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<sup>2</sup> *Id.* at 8.

<sup>3</sup> *Id.* at 11.

<sup>4</sup> *Id.* at 13.

### III. Conclusion

The CAISO appreciates the Commission, Judge Hymes, and Energy Division's work with stakeholders in this proceeding, and believes the PD represents stakeholders' consensus and the correct resolution. The CAISO supports the PD, and appreciates the Commission's diligent efforts in this proceeding.

Respectfully submitted,

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