California ISO

Stakeholder Comments Template

Energy Storage and Distributed Energy Resources (ESDER) Phase 4

This template has been created for submission of stakeholder comments on the Issue Paper for ESDER Phase 4 that was published on Feb 6, 2019. 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 **Feb 27, 2019**.

Submitted by	Organization	Date Submitted
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Please provide your organization's comments on the following issues and questions.

1. **Non-Generator Resource (NGR) model**

Please state your organization's position as described in the Issue Paper:

CDWR would like CAISO to clarify whether the proposed NGR changes may impact CDWR's Participating Generator Agreements (PGA) or Participating Load Agreements (PLA).

2. **Bidding requirements for energy storage resources**

Please state your organization's position as described in the Issue Paper:

Currently, CDWR has no comments on mitigating NGRs for local market power.

3. **Demand Response resources**

Please state your organization's position as described in the Issue Paper:

3.1. CDWR supports the general principle that bidding options available to demand response resources should reflect their operational characteristics and limitations.

CDWR would like CAISO to confirm that CDWR pump loads can use the upcoming PDR 15-minute and hourly bidding options under current Participating Load Agreements. Furthermore, CDWR would like CAISO to confirm the following:

1. The commitment cost options available to demand response resources are available to Participating Load resources;
2. When bidding 15-minute or hourly, the self-schedule option is still available.

3.2. Along with other factors, CDWR's pumps are also impacted by weather. The pumping levels can change up to 15-minute granularity. If modelled as NGR, CDWR would be forced to use an OMS outage to submit the de-rated (or re-rated) MWs on a 15-minute basis to reflect that limit.

CDWR would like to have the option of submitting the pump limits in 15-minute intervals and have the benefits of CAISO's real-time system to limit them. This is similar to CAISO using Variable Energy Resource (VER) forecasts to limit their dispatches. CDWR pumps do have very reliable multi-hour, 15-minute granular forecasts.

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

4. **Multiple-Use Applications (MUA)**

Please state your organization's position as described in the Issue Paper:

Currently, CDWR has no comments on the MUA topics discussed in the Issue Paper.

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

5. Additional comments

Please offer any other feedback your organization would like to provide on the Draft Final Proposal

CDWR supports exploration of real-time market bid options, both economic and self-scheduled, that will allow participating loads to be dispatched in hourly blocks or 15-minute increments to increase or decrease energy consumption in preset MW increments. With these new bidding options, participating loads should also be allowed to retain their resource adequacy participation.

CDWR believes there are times that CDWR can offer some of its pumping load to the CAISO market to help with oversupply conditions. This functionality will also allow CDWR to better manage its imbalance energy. Currently in the real-time market, CDWR's Participating Load resources are only allowed to bid energy to decrease consumption (curtailment).

CDWR believes that much of the functionality it seeks for its Participating Loads is similar to the functionality provided to PDRs in ESDER3. Therefore, many of the same design elements can be reused. CDWR looks forward to exploring these new Participating Load bidding options in the ESDER4 initiative.