

## Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your written comments on the ESDER Phase 2 stakeholder initiative Third Revised Straw Proposal posted on April 17, 2017.

Submit comments to [InitiativeComments@CAISO.com](mailto:InitiativeComments@CAISO.com)

**Comments are due May 18, 2017 by 5:00pm**

The Third Revised Straw Proposal posted on April 17, 2017 and the presentation discussed during the May 4, 2017 stakeholder conference call can be found on the [ESDER Phase 2](#) webpage.

Please use this template to provide your written comments on the Third Revised Straw Proposal topics listed below and any additional comments you wish to provide.

### 1. Alternative Baselines to Enhance Demand Response

Section 5.1.3 of the Third Revised Straw Proposal provides the alternative baselines proposal that was developed by the Baseline Analysis Working Group (“BAWG”). The CAISO requests that stakeholders provide comments on the proposal in the following areas:

- a) Do stakeholders support the BAWG’s recommended baselines for adoption by the CAISO?

- b) Does the BAWGs proposal report, April 4, 2017 version, provide the necessary level of detail for demand response providers to implement the proposed baseline options?

**Comments:**

The California Efficiency + Demand Management Council (“Council,” previously the California Energy Efficiency Industry Council) appreciates the opportunity to provide comments on Section 5.1 of the ESDER 2 Third Revised Straw Proposal addressing alternative baselines to enhance demand response.

The Council supports the recommendations of the Baseline Analysis Working Group. Baselines are a critical component of measuring performance for customers participating in demand response programs, and we’ve proven over the years that one baseline does not fit all resources/customers/programs. We are pleased to see CAISO tackling this issue and proposing alternative baselines to assess the performance of Proxy Demand Response (PDR) and Reliability Demand Response Resource (RDRR) when the current 10-in-10 baseline methodology is sufficiently inaccurate.

The additions of weather and day matching and randomized control groups for residential resources should significantly improve the accuracy and reduce the bias compared to the 10-in-10 baseline. Our members who participated in the Baseline Analysis Working Group had high praise for the process and the resulting recommendations. We look forward to continuing to work with the CAISO on efforts to enhance demand response in its markets.

Our comments on the proposal are limited to this section at this time.