

Stakeholder Comments
Commitment Cost Enhancements
Phase3 (CCE3)
Issues Matrix
June 24, 2016

Submitted by	Company	Date Submitted
Dr. Barbara R. Barkovich, Barkovich & Yap, Inc. Barbara@barkovichandyap.com 707 937-6203	On behalf of California Large Energy Consumers Association	July 6, 2016

The California Large Energy Consumers Association (CLECA) provides these brief comments on the questions posed on the Issues Matrix for DR and Storage for CCE 3 dated June 24, 2016.

Items for feedback:

1. *Proposed agenda topics*

According to the Issues Matrix, the proposed agenda for next meeting is:

1. Use-limitation data plan template (ULPDT)
2. Proxy cost methodology for commitment costs
3. CCE3 methodology for opportunity costs
4. Use-limited reached outage cards

CLECA believes that these are all good topics, but that they might be ordered differently and that additional issues should be included.

CLECA proposes the following agenda:

1. Proxy cost methodology for commitment costs, specifically as they would apply to demand response (DR) and storage, and sample calculations.
2. CCE 3 opportunity cost calculation for DR and storage (assuming proposal is accepted by FERC), with focus on appropriate inputs as well as the methodology. This should include sample calculations for DR and storage.
3. ULR registration process for DR and storage as well as template
4. Status of PRR 887, which appears to be suspended
5. Explanation of the different types of outage cards, including those proposed to manage limitations and how they are planned to be replaced by opportunity costs vs. outage cards to be used when a limitation is reached, including fatigue breaks.

2. *To better facilitate discussions on agenda item #1 and #3, please indicate if PDR resources have limitations other than events per month, events per year, run-hours per month, run-hours per year, and run-hours per event.*

3. To better facilitate discussions on agenda item #1, please indicate what documentation can be provided to the ISO which would verify/validate the limitations of the PDR resource for the four types of supply side demand response (DR) (DRAM or pro forma contract DR, Third party direction participation, Utility DR Programs, and Utility aggregator-managed programs).

4. To better facilitate discussion of agenda items #1 and #3, please indicate if storage resources operating as PDR resources in the ISO markets

CLECA thinks that others, including utilities, DRPs and storage advocates, can better answer these questions. We look forward to participation in the next workshop.