

## 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 3 Straw Proposal discussion during the March 29, 2018 technical working group.



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

**Comments are due April 9, 2018 by 5:00pm Pacific Time**

- Does the current CAISO “Metering BPM Appendix G” requirements apply to EVSEs?
- Does the 10-in-10 customer baseline methodology capture an EVSE performance, or does the CAISO need to consider another baseline?
  - If the load point adjustment is not applied, is there another adjustment that should be considered?

The CAISO should have an approach that accurately determines whether there is an actual load drop when this product is deployed. Thus, metering should determine aggregate customer load performance, rather than focusing on the measurement of a single piece. A load may have several meters and EVs could be easily moved around between these meters, whether the meters are measuring EV consumption or standard household consumption. Such movement could show a drop on one meter, but result in no net benefit to the system. The way to prevent such an outcome would be to either use a baseline scenario or to ensure that the EVs cannot be reconnected to different meters.

### 2. Load Shift Product

In addition to providing comments on the overall design elements of the Load Shift Product, please provide comments to the specific topics/questions below:

- Please comment on the CAISO’s proposal to establish two resource IDs and the bidding requirements for the load curtailment and consumption.
- Please provide comments on the Metered Energy Consumption (MEC) methodology
  - The CAISO presented an example that measured typical use with consideration of only the load consumption in “non-event hours” during the 10-in-10 baseline calculation and an example that considered both load curtailment and consumption; please comment on either calculation.
  - Are there other calculations that could measure typical use?

**Comments:**

While SCE supports exploring the Load Shift Product, it recommends that stakeholders be mindful of evolving rate design. Given that rate design is progressing toward incentivizing a more responsive load, any proposed design changes should be aware of that fact. The system should not end up with multiple, duplicative incentives to do the same thing, which would, in turn, result in higher ratepayer costs to achieve the same purpose. As retail rate design evolves, it may be necessary for the local regulatory authorities, in coordination with the CAISO, determine which rate designs are and are not eligible to participate in programs like load shift to avoid duplicative incentives.

**3. Other comments**

Please provide any additional comments not associated with the topics above.

**Comments:**

[Insert comments here]