



Stakeholder Comments Template

Excess Behind the Meter Production: Straw Proposal

This template has been created for submission of stakeholder comments on the **Excess Behind the Meter Production: Straw Proposal** that was published on **September 11, 2019**. The **Excess Behind the Meter Production**, Stakeholder Meeting presentation, and other information related to this initiative may be found on the initiative webpage at: <http://www.caiso.com/informed/Pages/StakeholderProcesses/ExcessBehindTheMeterProduction.aspx>

Submitted by	Organization	Date Submitted
<i>Seth Cochran</i>	<i>DC Energy</i>	<i>9-26-2018</i>

Upon completion of this template, please submit it to initiativecomments@caiso.com.

Submissions are requested by close of business on **September 26, 2019**.

Please provide your organization's comments on the following issues and questions.

Gross Load tariff definition clarification

Please state your organization's position on the **reporting of Gross Load tariff definition clarification** as described in the **Excess Behind the Meter Production: Straw Proposal**: (Support, support with caveats or oppose)

DC Energy supports this initiative's objective to ensure Gross Load is reported consistently.

Excess Behind The Meter Production tariff definition clarification

Please state your organization's position on the **Excess Behind the Meter Production tariff definition clarification** as described in the **Excess Behind the Meter Production: Straw Proposal**: (Support, support with caveats or oppose)

DC Energy supports this initiative's objective to establish a definition for Excess Behind the Meter Production and how its reported to the CAISO and settled.

Excess Behind The Meter Production reporting and settlements

Please state your organization's position on the **Excess Behind The Meter Production reporting and settlements** as described in the **Excess Behind the Meter Production: Straw Proposal**: (Support, support with caveats or oppose)

See answer to question #2

Additional comments

Please offer any other feedback your organization would like to provide on the **Excess Behind the Meter Production: Straw Proposal**.

This initiative presents an opportunity to improve the market transparency of Excess Behind the Meter Production. DC Energy requests that the CAISO make available hourly Excess Behind the Meter Production information by Default Load Aggregation Point to CAISO market participants. The aggregated information could be reported in real-time at the end of each interval or produced in a monthly report. Our request would give market participants more insight into the market and reliability impacts of this growing resource.