

COMMENTS OF GREEN CHARGE NETWORKS-:

**Energy Storage and Distributed Energy Resources Working Group Call Alternative Proposal –
10/27/15 Stakeholder Call**

Submitted by	Company	Date Submitted
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Green Charge Networks (GCN) supports the Meter Generator Output (MGO) Alternative ‘g-typical’ baseline methodology, as proposed on the 10/27/15 ESDER Working Group Call. GCN views the MGO Alternative as a crucial addition to the ESDER initiative, as it will drastically increase the capacity and frequency of which our DER fleet will be able to effectively participate in the CAISO market.

The g-typical baseline benefits DER providers, site hosts, as well as the CAISO market. The sub-metered resource data provides a far more accurate measure of which operations apply to which use-case: on-site services or market-award. Furthermore, the 10-day non-event threshold, for determining if a resource is ‘market-first,’ appropriately adjusts the evaluation mechanism around the primary operations of the resource. With these adjustments, providers and hosts are able to maximize resource capabilities, while ensuring that concerns such as positive baseline adjustments are avoided.

GCN applauds the CAISO’s efforts throughout the entire ESDER initiative, and looks forward to the continued improvement and development of the MGO and other baseline methodologies in Phase 2.