

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.



Submit comments to InitiativeComments@CAISO.com

Comments are due May 21, 2018 by 5:00pm Pacific Time

The CAISO posted the ESDER 3 Revised Straw Proposal on April 30, 2018, followed by a web conference on May 10, 2018. The presentation and all supporting documents can be found on the [ESDER 3](#) webpage. The CAISO requests your comments to the ESDER3 proposal:

1. Demand Response

- New bidding and real-time dispatch options for demand response (DR)
- Removal of the single load serving entity (LSE) aggregation requirement and the need for application of a default load adjustment (DLA)
- PDR-Load Shift Resource
- Measurement of behind the meter electric vehicle supply equipment (EVSE) load curtailment

Comments:

The Joint DR parties support the enhancements for DR proposed in ESDER 3.

We are concerned about the proposed timeline for implementation of the removal of the single LSE requirement and the need for the application of the DLA. We understand that an expected implementation timeline is Fall 2019. The single LSE requirement has caused significant issues of stranded customers due to LSE diversity in relatively small portfolios and is further exasperated in the DRAM pilot causing mis-matches between the volumes per PDR reported in supply plans to the IOUs 60 days prior to the delivery and what is the resource compositions are in the actual delivery month – due customer migration to CCAs and among ESPs. This has diminished the value of capacity and is keeping contracted and available resources out of the market simply due to timing. While the removal of the single LSE requirement will require FERC approval, the system enhancements seem minimal. The JDRP urge the CAISO to implement this measure in Spring 2019 to minimize this barrier and allow DR resources to be more fully available for the final summer of the DRAM pilot.

The Joint DR parties hope that a future ESDER 4 would include expanding the load shift product beyond only battery storage and the expand the ability to calculate performance of a submetered load from only EVs to other submetered usages. We look forward to participating in developing these additional enhancements.

2. Multiple-Use Applications

- The CAISO, in its Revised Straw Proposal, has not identified additional topics at this time, but will reevaluate once the draft report under the CPUC MUA working group is complete.

Comments:

[Insert comments here]

3. Non-Generator Resource

- The CAISO proposes to develop a process to define use-limited status for NGRs.
 - What are the potential use-limited qualifying factors and types of documents to qualify use-limitation?

Comments:

[Insert comments here]

4. Additional workshop needed

- What topics would stakeholders want to discuss if the CAISO holds a workshop?

Comments:

[\[Insert comments here\]](#)

5. Other comments

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

Comments:

[\[Insert comments here\]](#)