California ISO

Joint EV Charging Parties Comments

Energy Storage and Distributed Energy Resources Phase 3

Submitted by	Organization	Date Submitted
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Please provide your organization's comments on the following issues and questions.

1. **Bidding and real-time dispatch options for Demand Response**

The Joint EV Charging Parties **support** the bidding and real-time dispatch enhancements for demand response. Current utility metering limitations make accurate settlement for physical performance impossible, and these enhancements can correct this deficiency in supply-side demand response, while also creating greater flexibility for demand response resources to provide the their maximal amount of flexibility without being unfairly discriminated against for doing so.

2. **Removal of the single load serving entity aggregation requirement and the application of a default load adjustment**

The Joint EV Charging Parties **support** the removal of the single LSE requirement per PDR. Given the proliferation of LSEs within CAISO's jurisdiction, this issue is critically important. In fact, CAISO should consider eliminating the requirement and the DLA immediately, if allowable under the Tariff, or FERC approval of the Tariff amendment, *prior* to the system updates to prevent

below Net Benefits Test levelbids. With the launch of new LSEs expected in 2018 and early 2019, the urgency to reflect this consensus change to market operations should be heeded.

3. Load shift product for behind the meter storage

The Joint EV Charging Parties **support with caveat** the Load Shift Resource for behind the meter energy storage. Multiple parties at the outset of this ESDER Phase 3 requested that Load Shift participation be available to all PDR participation types, rather than solely those utilizing a PDR comprised entirely of MGO locations. If EVSE Submetering (see #4) is approved for use, PDR-LSR participation should, at a minimum, be available to a PDR comprised entirely of submetered EVSE locations, subsequent to inclusion and stakeholder engagement in an ESDER Phase 4. All of the Pre-Market, Market and Post-Market process identified by CAISO in this Draft Final Proposal would be applicable, with the exception of the measurement methodology. Submetered EVSEs present a much simpler scenario for settlement, whereby a *negative* DR Energy Measurement, during an LSR award interval, would be multiplied by the *negative* Locational Marginal Price, resulting in a positive settlement amount.

4. Measurement of behind the meter electric vehicle supply equipment (EVSE) load curtailment

The Joint EV Charging Parties **support** "measurement of BTM EVSE Load Curtailment" for Proxy Demand Resources (PDR) participation. CAISO Staff has engaged with demand response, EV, energy storage and utility industry stakeholders to develop this enhancement to the PDR participation model. It extends the existing and FERC-approved frameworks established in ESDER Phase 1 for Metering Generator Output (MGO) participation under the PDR model. The CAISO Staff has thoughtfully adapted traditional PDR participation to apply more appropriately to EV charging, in much the same way MGO was adapted, for example, 1) elimination of the Load Point Adjustment 2) exclusion of only "event" hours from the baseline calculation, and 3) allowance for “Load” and “EVSE” load reduction measurements within the same PDR. In addition, CAISO Staff has correctly enabled unique methodologies for residential and non-residential customer accounts as approved through the ESDER Phase 2 initiative.

Finally, the CAISO should have sufficient authority through its oversight of Schedule Coordinator Metered Entities (SCME) and control over the Business Practice Manual to ensure that this new enhancement to the PDR participation model has similar integrity to CAISO-integrated demand response, including that which participates as MGO.

5. Additional comments

The Joint EV Charging Parties requests that CAISO Staff indicate, within the Final Proposal, the expected timing for an ESDER Phase 4 initiative. The ESDER initiative process is a critical venue for defining DER market participation not only for California, but also the US and around the world. We expect that an ESDER Phase 4 will continue to lead the way.