

Stakeholder Comments Template

Submitted by	Company	Date Submitted
Brian Theaker 530-295-3305 brian.theaker@nrg.com	NRG Energy, Inc. ("NRG")	March 17, 2016

Please use this template to provide your comments on the Metering Rules Enhancements stakeholder initiative Issue Paper and Straw Proposal posted on February 23 and as supplemented by the presentation and discussion during the stakeholder web conference held on March 3, 2016.

Submit comments to InitiativeComments@caiso.com

[Comments are due March 17, 2016 by 5:00pm](#)

The Issue Paper and Straw Proposal posted on February 23 and the presentation discussed during the March 3 stakeholder web conference may be found on the [Metering Rules Enhancements](#) webpage.

Please provide your comments on the straw proposal topics listed below and any other comments you wish to provide in the final section.

[Providing existing metered entities the option to retain current requirements, or to opt for the SCME and SQMD Plan options.](#)

Under this proposal element, existing metered entities can maintain compliance with today's metering infrastructure and requirements without being required to change to the new tariff requirements unless they elect to do so. Submission of an SQMD Plan would not be required for these existing metering entities.

Comments: NRG supports this proposal.

[Allowing SCs the option to submit SQMD for all resources](#)

Under this proposal element the ISO is proposing to allow SCs the option to submit SQMD for load, generation, and intertie/intrastate resources. SCs that elect to take advantage of this option will be required to develop and submit a SQMD Plan.

Comments: NRG supports this proposal.

SQMD Plan

To maintain the integrity and quality of meter data used in market settlements, SCs that elect to take advantage of the option to submit SQMD for all resources will be required to develop and submit a SQMD Plan. These plans will provide SCs with the opportunity to demonstrate to the ISO that the meter data submitted to the ISO will be settlement quality. The ISO will provide minimum metering requirements which must be satisfied by the SQMD Plan for compliance. SCs will submit an annual self-audit report as part of the SQMD Plan. The ISO will reserve the right to perform audits and inspections on the implementation and use of each SQMD Plan.

The ISO is requesting comment on its proposed concept of a SQMD Plan requirement. The ISO is also requesting comment on the following items proposed to be a part of the SQMD Plan and whether there are other items that should also be considered:

- Metering facility design
- Procedures used for installation, testing, calibration, maintenance and security
- Program for on-going monitoring and inspection
- Meter data process
- Communication systems and processes
- SC self-assessment procedures

Comments: NRG supports the proposed SQMD plan concept. NRG has no other items to offer at this time.

Metering Exemptions

With advancements in metering technology, revenue meters are now capable of performing complex computations while still maintaining the accuracy and integrity of the data.

These complex schemes currently require exemptions from ISO Tariff section 10.2.1.2 Format for Data Submission.

The ISO receives a number of exemption requests for the requirement to provide “raw and unedited data” due to complex metering schemes.

Comments: NRG supports this proposal.

Other comments

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

Comments: The CAISO has offered that the objectives of this initiative would “...include, among others, reducing cost barriers to participate in the ISO market, **accommodating new and complex metering configurations,** integrating other BAAs, leveraging local regulatory authority metering requirements, considering existing investments in metering infrastructure and requirements in place today, and maintaining the quality and integrity of meter data used in market settlements.” (Issue Paper and Straw Proposal at Page 3, emphasis added.)

As the CAISO also notes: “However, with advancements in the metering technology, **revenue meters are now capable of performing complex computations while still maintaining the accuracy and integrity of the data**. This suggests the need to consider updating some of these metering rules. For example, allowing ISO revenue meters to communicate with other ISO revenue meters to perform complex computations, calculate losses and then apply the losses on the net output of each resource may be practical. Currently this would require an exemption.” (Issue Paper and Straw Proposal at Page 7, emphasis added.)

Given the CAISO’s intent to consider what metering arrangements may now be available given advancements in metering technology, NRG requests that the CAISO consider a particular configuration: allowing a single meter to provide information for two resource IDs. Specifically, the configuration NRG requests the CAISO consider is a configuration in which a meter would

associate all production up to a certain MW level with one resource ID, and associate all production above that MW level with another resource ID. in addition, the multiple resources on a single CAISO meter could share a single step-up transformer.