

Pacific Gas and Electric Company Stakeholder Comments

Submitted by	Company	Date Submitted
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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](#)

PG&E appreciates the opportunity to comment on the CAISO's straw proposal of February 23, 2016. This initiative is seeking to improve on a process that has gone largely unchanged for many years.

As Meter Data is the backbone of financial settlement, PG&E's primary concern with the proposed options for scheduling coordinator (SC) metered entities (SCMEs) is the potential effect on the accuracy of CAISO's market settlements process. With CAISO's markets expanding, it is understandable that CAISO would want to offer these options as well as reduce the burden on the CAISO's own metering operations. This should not, however, come at the expense of metering and settlement accuracy. If the CAISO is going to allow these additional options, there should also be a major emphasis on governance, guidance, and procedures for the proposed settlement quality meter data (SQMD) Plan and the annual SQMD Self Audit requirements to ensure all participants are providing accurate metering in a consistent and timely manner.

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

Regarding existing metered entities, PG&E is in agreement with CAISO that the new options being proposed should not negatively impact those resources.

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

As mentioned previously, PG&E's primary concern is the metering and settlement accuracy of the markets. With the introduction of new options for meter submittal and methodologies for aggregation of load values, PG&E recommends that the CAISO focus on ensuring that the proposed SQMD Plan and the existing SQMD Self Audit requirements provide clear governance and guidance for all SCs and metering entities to preserve an accurate and timely market settlement process.

Regarding the new SCME options, PG&E has the following clarification requests and questions:

- What specific controls or checks will the CAISO have in place to ensure metering and settlement accuracy beyond the typical tracking of unaccounted for energy (“UFE”).
- Will the CAISO have any size restrictions (minimum or maximum) for resources which choose the SCME path?
- If the path of SCME is chosen for a resource, please confirm that the Meter Service Agreement (MSA) will be signed by the resource owner as it is currently for an ISO metered entity (ISOME).
- Please clarify whether all meter installation and maintenance requirements will continue to be the responsibility of the resource owner, similar to ISOMEs in section 10.2.2, under the new options.
- Please clarify whether an SCME will be required to follow current CAISO tariff Section 10.3.2.2 SCME meter submission requirements. It is not clear from the proposal that this requirement will continue to apply.
- What interval granularity does the CAISO expect for inter-tie/intra-tie resources?
- Please clarify what is meant by “[f]or aggregated load value of a default load allocation point (DLAP), the SC calculates the SQMD from qualified tie meters and internal generators,” in the 4th proposed meter data processing method, as a new method for load meter submission. Is CAISO willing to accept a calculated value for load from load-serving entities (“LSEs”) as opposed to the current aggregation of customer meter data?

SQMD Plan

PG&E recommends that CAISO provide a standardized form for the proposed SQMD Plan. The SQMD plan should list all mandatory items and optional items to be included and it should be consistent across all SCMEs. Monitoring and accuracy requirements should be consistent with those expected from ISOMEs. PG&E also recommends that the CAISO develop a procedure and timeline expectations for when updates to an SQMD Plan are needed.

PG&E would also like clarification on the following:

- Please confirm that it will be the role of the SCME (as opposed to the SC) to test and monitor the metering devices. This would be consistent with expectations for ISOMEs under the current Tariff.
- The proposed topics for the SQMD Plan do not cover certification of metering devices. Will SCMEs be required to submit a 3rd party meter certification as ISOMEs are?
- What can SCs expect as a timeline for CAISO review of a SC-submitted SQMD Plan?
- PG&E requests more detail as to when and how CAISO will initiate an audit. For example, establishing a threshold or other guideline that determines when an audit is initiated.
- What level of detail is required on the SQMD plan, specifically regarding DERP resources and Load resources?

Metering Exemptions

PG&E recommends that the CAISO continue to, where appropriate, grant exemptions for resources which choose to be an ISOME. It would also be helpful if the CAISO clarified under which scenarios it would grant these exemptions in the future.

Other comments

PG&E has several additional questions and recommendations:

- In the Revised Straw proposal, CAISO should clarify and provide a list of the services each entity provides. Currently, this is done for different types of generators but not for other entity types.
- PG&E requests that the CAISO provide examples in the Revised Straw Proposal of complex metering configurations that the CAISO anticipates would benefit from the proposed enhancements.
- PG&E would appreciate better understanding of what the CAISO envisions as the implementation timeline for the SCME and SQMD Plan.
- PG&E recommends that the CAISO consider expanding current meter requirements to meet current meter technology as an alternative method of minimizing meter exemptions, besides the SCME option.
- It is unclear how the utility distribution company (“UDC”) will be able to bill sub-resources based on SCME data. Would the CAISO be able to require sub-resources to report to the UDC the amount going towards wholesale and retail?
- If there is a large impact to UFE from the transition to SCMEs operating under a SQMD Plan, how will the CAISO remedy this?