

Stakeholder Comments Template

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

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: SCE supports that existing metered entities can continue to maintain compliance with the current equipment and SCME requirements. Resources that are operating under an exemption should be required to comply with either the old SCME or the new tariff.

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:

Allowing the SC submit SQMD design plans may result in many different metering designs and specifications through-out the CAISO managed grid. This becomes a problem if the resource needs to switch SC as the new SC may not be compatible with the resource's metering equipment. This becomes a significant problem if the load serving entity (LSE) becomes a default provider of SC services. This would create an unfair cost burden to the LSE to be required to adapt to a one-off configurations. Furthermore situations which would require the transfer of SQMD from the ISO to the SC would also unfairly shift cost to the SC. Therefore, becoming a SQMD agent should only be a voluntary option in the ISO tariff.

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: A SQMD plan by nature will be generic unless the expectation is to have a plan for every resource that may have a non-standard metering configuration. A metering facility design in this case does not seem to add value from a portfolio perspective.

Additionally LSE portfolios will have resources in and out of its own territory and would not have the responsibility for meter specification standards. Standardization of at least installation, testing, calibration, maintenance, security, should be considered a benefit for all involved.

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: This is a tariff language issue and should not be considered a stumbling block. The tariff language should allow flexibility for approving metering schemes that pass a standard engineering best practices test and account for the intent. Exemptions cause work for all parties in the long run and should not be used if flexibility is available.

Other comments

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

Comments: As the future of the grid is a landscape of variable resources that are connected at the distribution level, flexibility of technology use and standards should be applied to follow the intent of accuracy and visibility. The out fall of this is big data that is the true issue and how to make that data available for use. With the many varying ways smart meters were deployed it may be some time before the data is attainable for mass use.