

SCE comments on draft CAISO PL User Guide

Com ment #	PDF Page #	Doc. Page #	Comment Subject	Comment	Response
1	5	1	Bidding Process	The first sentence of the fourth paragraph on this page seems to contradict something that CAISO states on page 26 of the PDF. Are SC's required to bid both a resource (pseudo-generator) and enough energy to cover that load (PL), or do they have the option to just bid the resource, and take the chance that they will be bid and will not have to purchase energy to cover the load?	The SCs are not required to self-schedule enough load in the Day Ahead market to cover their non-spin bid or award but by not self-scheduling enough load they may risk a no-pay in real-time. There are minor edits in the revised document to clarify this.
2	9	5	Settlement Process	SCs providing PL resources will not be given RUC payments, according to the last sentence on this page. However, the paragraph above this one states "RUC will factor PL in" based on the PL forecast. If CAISO is factoring PL into the RUC stack, why would we not get a RUC payment for it?	Under MRTU Release 1, PL is ineligible to bid into RUC and, therefore, there is no RUC availability payment. However, any PL that clears the Day-ahead market lowers the CAISO's RUC procurement target by lowering the overall CAISO demand forecast. The PL curtailment in the IFM is similar to a generator clearing IFM. Both effectively reduce the RUC procurement target, and neither is paid RUC availability. Note; The inability in MRTU Release 1 for a PL resource to bid into RUC and earn an availability payment should not be onerous since RA resources¹ are ineligible to receive a RUC availability payment.
3	10	6	Settlement Process	Please clarify point (b) the Non-spinning Reserve is deployed and delivered (based on telemetry), during a contingency, but the hourly metered consumption of the Participating Load is not adequate to cover the Energy associated with the total awarded Non-spinning Reserve capacity for the hour less the deployed Energy.	Clarifications have been added to the document. Thanks for the comment
4	12	8	Technical Requirements	What type of timeframe does CAISO anticipate needing to review and approve our PL implementation plan (if we, in fact, need to submit one)?	The Document states 10 to 30 business days depending on the completeness of the plan and the complexity of the application.
5	12	8	Technical Requirements	How long will CAISO need to conduct, review and approve the Participating Load Acceptance Test (PLAT)? This is important because completion of PLAT could be a "critical path" for us to bid our resource into the new CAISO markets.	Please note that the PLAT procedure was primarily intended for certification of vendor devices. It is being replaced with a new procedure entitled Participating Load eDAC Deployment Guide in which CAISO is establishing the minimum requirements and

¹ Participating Load resources would be eligible Resource Adequacy Resources and could help satisfy a LSE's resource adequacy needs; therefore, the CAISO believes that PL resources would likely be counted as RA capacity in nearly all cases.

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					criteria for eDAC. The PL provider must demonstrate successful compliance to the requirements established in this new document. CAISO will not conduct certification tests at the device level; the overall eDAC system performance is of interest to CAISO.
6	14	10	Technical Requirements	As described in the draft Memorandum of Understanding, can we expect the ISO to relax some of these requirements around the eDAC / ECN for the Participating Load Pilot?	Any relaxation of the requirements (including the eDAC) will be discussed and agreed to in the MOU (aka Pilot Agreement) between CAISO and SCE.
7	15	11	Technical Requirements	This Ancillary Services test appears to be another testing/certification in addition to the PLA/PLIP/PLAT/RDT. What type of things are going to be tested on for this? How long will it take to get the test done? Are there WECC or CAISO standards? If this is a WECC requirement, we could be looking at another critical path for bidding a resource as an ancillary service.	The testing will include a) eDAC technology and b) resource capability for providing A/S. The CAISO resource eligibility testing requirements are based on the WECC requirements.
8	16	12	MRTU Issues	Will we need to designate our Participating Load Pilot test site as a CLAP? What types of steps do we need to take to get this done? Specifically, our CLAPs designated based on geographic features (e.g., the cities of Monrovia and Arcadia) or are they based on the topology of our power grid (e.g., everything beneath a certain "A Bank").	This will be coordinated through CAISO's Contract and Implementation Project Manager. The requirement for a CLAP is that all the participating loads need to be in a Local Capacity Area. The boundaries of Local Capacity Areas can be found in CAISO's most current Local Capacity Area Technical Study, (which is updated annually around October). For SCE this will be CPUC.
9	20	16	MRTU issues	What does a "Local Regulatory Authority" mean in this paragraph (third from the bottom of the page).	
10	23	19	Technical Requirements	What is the little cubic gadget underneath the two meters on the far left of the telemetry illustration here?	It illustrated that the telemetry source may be different from a meter, e.g., a PLC or other data acquisition equipment.
11	25	21	Settlement Process	Please clarify when a LSE/CSP would receive RUC payments (reference the third bullet).	Under MRTU Release 1 PL is not eligible to participate in RUC , and thus it is ineligible to receive RUC payments.
12	25	21	MRTU issue	Please clarify what qualifications will be added to a "contingency only" bid.	The SC can designate Contingency-Only bids by including a "Y" for Contingency-Only field of the bid template
13	26	22	Bidding Process	There seems to be a contradiction between this page and the first sentence of the fourth paragraph on PDF page 5 (reference issue #1). Are SC's required to bid both a resource (pseudo-generator) and enough energy to cover that load	See clarifications provided to comment # 1 above. The text in the Document has been also adjusted.

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				(PL), or do they have the option to just bid the resource, and take the chance that they will be bid and will not have to purchase energy to cover the load?	
14	38	34	Technical Requirements	What type of metering requirements are we looking at for aggregated loads? Would we theoretically need to have Revenue Quality Interval Metering Data on all of the hundreds or thousands of loads that make up the aggregated PL?	The meters used for individual loads of an aggregated load needs to comply with the requirements of the Local Regulatory Authority (e.g., CPUC). For PL providing A/S the interval meters should have at least 15 minute time resolution.
15	40	36	Technical Requirements / Settlement Process	Please clarify SQMD Standard #2.	This allows the flexibility of using an auditable load profile.
16	40	36	Settlement Process	We need more clarity on the intervals that are required for PL operating as an ancillary service under MRTU release 1, because this statement seems to clash with one at the top of page 39 (PDF). Is a 15 minute interval split into three mini-intervals adequate?	Yes, 15 minute interval split into three mini-intervals is adequate for Release 1 of MRTU PL. A clarification is added to page 36 of the Document.
17	40	36	Settlement Process	See comment #16. If we have to provide SQMD at the granularity scheduled, does that mean that a single aggregated meter will be adequate for aggregated loads?	The answer is yes.
18	41	37	Settlement Process	What exactly is in CAISO metering protocol section 9? Apparently the individual loads of a participating load have to meet the security requirements as laid out there.	<p>Please see attached document</p>  <p>Metering Protocol.pdf</p>
19	29	25	Settlement Process	Section 6 discusses Settlement and Validation, where validation appears to be derived through settlement execution. The CAISO has dispute resolution processes which presumably pertain to Participating Loads bidding into CAISO's wholesale markets. It may be helpful to reference the appropriate documents in the User Guide for how participants may dispute the CAISO's calculation of settlements.	<p>Thank you. We have included a reference to the Settlement Dispute resolution process in the revised document. Here are the relevant links for further information:</p> <p>http://www.aiso.com/docs/2002/09/09/200209091241088448.pdf</p> <p>http://www.aiso.com/docs/2004/11/02/2004110209484520212.html</p> <p>The dispute submittal guide can be found at</p>

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<http://www.caiso.com/docs/2004/11/01/2004110116551515300.html>

20	22	18	Settlement Process	<p>There is a somewhat ambiguous sentence on Page 18, the last sentence preceding the start of Section 4.2. The sentence reads as follows: "Discrepancies, if any, related to a difference between the CAISO settlement interval and the retail meter data storage interval must be resolved at the direction of the CAISO." What does "at the direction of the CAISO" mean? The User Guide would benefit from a more explicit detailing of how discrepancies will be resolved.</p>	<p>The word should be "discretion". There could be two general categories of discrepancy: a) systematic discrepancies due to misalignments and calibration, and b) sporadic discrepancy. The first category is dealt with on a case-by-case basis and the second through dispute resolution process.</p>
21	24	20	Bidding Process	<p>(D) Section 5.1: Scheduling and Bidding Requirements The third paragraph notes that "The CAISO may adjust the A/S and Real-time Imbalance Energy requirements temporarily to take into account, among other things, variation in conditions, real time dispatch constraints, contingencies, and voltage and dynamic stability assessment."</p> <p>Should the User Guide (or does it belong in a BPM) outline the criteria the ISO will use to temporarily adjust A/S and RT Imbalance Energy Requirements?</p> <p>Should the User Guide (or some other document) outline how the CAISO's discretion may impact the pricing of DR that is bid into the market?</p> <p>If temporary adjustments are made, should there be compensation to bidders if the effect of the adjustment is to devalue DR bids against what they would have cleared for, had the CAISO not exercised discretion to temporarily adjust A/S and RT Imbalance Energy requirements?</p>	<p>The paragraph is deleted.</p> <p>The issues stated are not PL specific and belong to the appropriate BPM. Thanks for the comment.</p>

General Comments

Please clarify that this is a Release 1 User Guide in the title of the document	Yes it is. Thank you.
Are PDR and DDR products of MRTU MAP or will they be available in Release 1? If they are available in Release 1, they should be addressed in the User Guide.	DDR is part of MAP. PDR is being considered for rollout later in Release 1. A separate Users Guide is contemplated for each.
SCE raised many issues in Volume 2 of their Demand Response application to the CPUC. Many of	CAISO requests SCE to be more specific and

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the issues raised are not addressed in the BPM or User Guide. Recommend review of SCE's list of issues to determine what documentation will clarify or resolve the issues after stakeholder input, recommendations and agreement.

point out exactly which specific issues are not addressed in the Users' Guide and need to be clarified in the context of PL in MRTU Release 1.

It might be helpful to all participants to be reminded of the differences between the role and purpose of the "Users Guide" compared to the role and purpose of Business Practice Manuals (BPMs).

Concur. Users Guide is not a replacement for the BPM. In case of conflict BMP prevails.

The "Users Guide" in its definitions section refers to "Protocols," specifically -- "Metering Protocol," "Transmission Control Protocol," and "Internet Protocol (TCP/IP)." Does a more specific outline of the differences between these terms and how they are used need to be included?

The word "protocol" needs to be taken in the proper context. The Metering Protocol" and "Transmission Control Protocol" are guidelines and procedures, whereas "Internet Protocol (TCP/IP)" is a technical (bits and bytes oriented) specification.

The User Guide does not formally define "Participating Load" and "Non-Participating Load" in any one place in the document. These terms should be included in the Definitions section 1.2 for ease of reference.

Non-Participating load is no longer used in this document.