



Stakeholder Comments Template

Hybrid Resources Initiative: Metering & Telemetry Technical Workgroup

This template has been created for submission of stakeholder comments on the **Hybrid Resources Initiative, Metering & Telemetry Technical Working Group** that was held on August 27, 2019. The meeting material and other information related to this initiative may be found on the initiative webpage at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/HybridResources.aspx>

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **September 10, 2019**.

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

1. Metering Layout for Grid and Distribution Connection

There are a number of metering configurations that are available to the generating facilities that were presented during the 8/27/19 meeting. Please provide your organization's feedback on any issues related to the metering configurations discussed. Please explain your rationale and include examples if applicable.

The CAISO did a good job including many possible metering configurations that should cover most use cases. However, SDG&E wants to make sure that new unique use cases are not constrained by a limited set of metering configurations. The CAISO should have the ability to approve metering configurations not presented that properly account for all metering needs for a unique use case. SDG&E does not want any metering configurations to be eliminated at this time just because no one is currently considering it. Only metering configurations that cannot supply all absolutely needed information should be eliminated. Ease of forecasting is not absolutely needed information. Other data collection methods can possibly fill a metering gap for forecasting so a metering configuration that makes forecasting difficult should not be eliminated at this point.

Some use cases may depend on a specific metering configuration and eliminating it without sufficient reason would be inappropriate. For example, a single resource ID for a combined battery CT plant can be appropriate to change non-spin reserve to spinning reserve. Forcing two resource IDs for the battery and the CT would be inappropriate

because the higher value spinning reserve would be eliminated without gaining any absolutely needed metering information. The CAISO must retain as much flexibility in metering configuration as possible to allow use cases to develop with market forces.

2. Metering Layout for AC and DC connection

There were a number of metering configurations available for AC and DC connection of hybrid resource components that were presented during the 8/27/19 meeting. Please provide your organization's feedback on any issue related to the AC and DC metering issues that were discussed. Please explain your rationale and include examples if applicable.

SDG&E has no direct comments on metering configurations available for AC and DC connection of hybrid resource components at this time.

3. Other metering and telemetry needs

Please provide your organization's feedback on other metering and telemetry needs for hybrid resources.

Some metering configurations could make WREGIS RPS reporting a problem for SDG&E. Having a single meter that combines a renewable resource with a battery that can charge from the grid is a problem without additional metering. It may not be a serious problem if the battery only charges from the renewable resource, but forecasting may be more difficult. The CAISO must balance metering simplicity with operational goals. More discussion is needed to obtain the proper balance.

Additional comments

Please offer any other feedback your organization would like to provide on the Hybrid Resources Initiative.