

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: ***The Six Cities support this aspect of the ISO's 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: ***The Six Cities have no comments on this aspect of the ISO's proposal at this time.***

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: ***It is important to the Cities that Market Participants can be confident that the data the ISO relies upon for settlements purposes is accurate. The ISO's existing metering requirements are one way to help ensure such accuracy. The Six Cities request that the ISO provide more information about the expected impacts of its proposal to expand the use of SQMD subject to a SQMD Plan. Specifically, how will***

the ISO monitor and enforce compliance with the SQMD Plan? The Six Cities acknowledge that the current proposal includes an annual self-assessment and certification process, but what additional steps will the ISO take to ensure that accurate SQMD is submitted and SQMD Plans are followed? What safeguards will be in place to verify accurate reporting of data under the SQMD Plan? One approach the ISO could consider is periodically auditing a sampling of data from entities that submit SQMD pursuant to a SQMD Plan.

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: The Six Cities urge the ISO to provide more information about when “raw and unedited data” is acceptable such that a metering exemption would be granted. Does the ISO’s proposal contemplate the submittal of “raw and unedited data” only if consistent with a SQMD Plan? Particularly if submittal of “raw and unedited data” is necessary “due to complex metering schemes,” is the ISO responsible for taking any actions with regard to such data in order to use it for settlements?

Other comments

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

Comments: The Six Cities have no further comments.