



Stakeholder Comments Template

Energy Storage and Distributed Energy Resources Phase 3

This template has been created for submission of stakeholder comments on the Draft Final Proposal of ESDER 3 that was published on July 11, 2018. The Draft Final Proposal, Stakeholder Meeting presentation, and other information related to this initiative may be found on the initiative webpage at: [ESDER Webpage](#)

Upon completion of this template, please submit it to initiativecomments@caiso.com.

Submissions are requested by close of business on **July 27, 2018**.

Submitted by	Organization	Date Submitted
<i>Steven Rymsha</i>	<i>Sunrun</i>	<i>7/27/2018</i>

Please provide your organization's comments on the following issues and questions.

Load shift product for behind the meter storage

Please state your organization's position as described in the Draft Final Proposal:
(Support, support with caveats or oppose)

Sunrun supports the proposed Draft Final Proposal

Additional comments

Please offer any other feedback your organization would like to provide on the Draft Final Proposal

Hybrid DC coupled PV and energy storage inverters pose unique AC metering challenges during the load consumption period, thus we request DC metering performance verification options be allowed to ensure these hybrid resources can support this important initiative.