



## Stakeholder Comments Template

### Excess Behind the Meter Production: Revised Straw Proposal

This template has been created for submission of stakeholder comments on the **Excess Behind the Meter Production: Revised Straw Proposal** that was published on **November 5, 2019**. The presentation and all related information for this initiative may be found on the initiative webpage at:

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

Submitted by	Organization	Date Submitted
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Upon completion, please submit this template to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com) by end of day **November 27, 2018**.

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

The Western Power Trading Forum (WPTF) is a California nonprofit, public benefit corporation. It is a broad-based membership organization dedicated to enhancing competition in Western electric markets while maintaining the current high level of system reliability. WPTF supports uniform rules and transparency to facilitate transactions among market participants. The membership of WPTF and the WPTF CAISO Committee responsible for providing these comments include CAISO and EIM entities, load serving entities, energy service providers, scheduling coordinators, generators, power marketers, financial institutions, and public utilities that are active participants in the California market, other regions in the West, and across the country.

#### 1) **Gross Load tariff definition clarification**

Please state your organization's position on the **Gross Load tariff definition clarification** as described within the **Revised Straw Proposal**: (Support / Support with Caveat / Oppose)

No comment.

#### 2) **Excess Behind the Meter Production tariff definition**

Please state your organization's position on the **Excess Behind the Meter Production tariff definition**, as described in the **Revised Straw Proposal**: (Support / Support with Caveat / Oppose)

No comment.

### 3) **Excess behind-the-meter production reporting and settlements**

Please state your organization's position on the **Excess Behind the Meter Production reporting and settlements**, including the proposal to update the current **Unaccounted-for-Energy (UFE) determination**, as described in the **Revised Straw Proposal**: (Support / Support with Caveat / Oppose)

No comment.

### 4) **Amended charge codes allocated based on gross load**

Please state your organization's position on the **Excess Behind the Meter Production charge codes related to reliability (rather than energy)**, for allocation based on **gross load**, as described in the **Revised Straw Proposal**: (Support / Support with Caveat / Oppose)

No comment.

### 5) **Application of losses**

Please state your organization's position on the **Excess Behind the Meter Production application of losses**, as described in the **Revised Straw Proposal**: (Support / Support with Caveat / Oppose)

No comment.

### **Additional comments**

Please offer any other feedback your organization would like to provide on the **Excess Behind the Meter Production: Revised Straw Proposal**.

WPTF appreciates the CAISO's commitment to publishing Behind the Meter Production data. Based on the discussion during the stakeholder call, the CAISO had yet to determine the level of granularity, both in terms of location and timing, for which the data would be published. The valuable insights this data could provide depends on the level of granularity reported. It would be challenging to assess the impact behind-the-meter data has on pricing if the data is reported at the system level per day; the hourly profile of behind-the-meter production, and its impact on prices, can only be made transparent if the data were reported at a more granular level. WPTF would like

to reiterate its ask for the CAISO to publish the data by DLAP for each 5-minute interval which would facilitate the ability to evaluate the impact on day-ahead and real-time prices.

WPTF would also like to take this opportunity and encourage the CAISO to consider how this additional valuable information can be used to better inform other market requirements, such as operating reserves and resource adequacy requirements. We understand these topics are outside the scope of this initiative but ask the CAISO to incorporate the impact of behind-the-meter production in other on-going policy discussions.

WPTF thanks the CAISO for consideration of our comments