

Comments on CAISO Excess BTM Production Issue Paper (published on June 28, 2018)

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As presented in the ISO Issue Paper, the growth of rooftop solar and other behind the meter (BTM) resources has been mounting rapidly and should continue this growth in the future. Clearly, the ISO Tariff, created 20 years ago, did not recognize or project this change in the production of generation. Therefore, it is important to re-evaluate the definition of Gross Load and to create a definition that provides transparency and consistency for the ISO Market.

Section 6.2, “Develop standard reporting practice for excess BTM production” requests stakeholder feedback with: “... a focus on any considerations that may need to be made when developing a standard reporting practice for excess BTM production.” These comments below will be focused on the creation of the Gross Load definition and identifying consistent applications for reporting and processing of Gross Load for all market participants.

1. The issue paper discusses UDCs reporting of Load and possible excess BTM production. The ISO should consider that not all Load in the ISO market is “reported” or submitted by the UDCs. The Load used in the ISO market settlement can be processed and submitted by the SC or can be processed by the ISO through CAISO ME metering. Simply put, the Load resources are identified either as CAISO ME or SC ME. Below are typical resources under each categories:

Metering Type	Resources
CAISO ME	Participating Generators Large Loads (such as pumping loads, grid connected loads) Small UDCs (utilities that receive separately calculated unaccounted for energy, UFE) Metered Subsystems (MSS)
SC ME	Bundled Customers (submitted by the three Investor Owned Utilities, IOU)

	Direct Access Customers (submitted by Scheduling Coordinators, SC) Community Choice Aggregation (CCA) (submitted by SC) EIM entities (submitted by SC)
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2. The ISO Tariff seems to be clear for Settlement Quality Meter Data (SQMD) submitted by the SCs for SC MEs. Tariff Section 10.3.2.1 “Duty to Provide Settlement Quality Meter Data” states in part; “...Settlement Quality Meter Data for these Scheduling Coordinator Metered Entities shall be an accurate measure of the actual production or consumption of Energy by each Scheduling Coordinator Metered Entity in each Settlement Period.” This requirement appears to already require SCs that submit SQMD for SC MEs to already submit Gross Load, which would be “actual consumption of Energy”.

Clarifying, maybe in the Metering BPM, of the practice of submittal of Load for the SC MEs needs to address unique situations as:

- Entities covered under SQMD Plans, such as EIM entities, that submit their Load based on a calculation using Generation, Imports and Exports from their territory.
 - Any unique Local Regulatory Authority (LRA) requirements. The ISO Tariff requires SCs who represent SC MEs to ensure compliance with all applicable requirements of any relevant LRA (ISO Tariff 10.3.10.1). Even though Bundled and Direct Access customers fall under the CPUC as their LRA, CCAs and EIM entities may have different LRAs and they may have specific rules describing how to accommodate the excess BTM production.
3. For CAISO MEs, specifically those utility Service Areas which have separate UFE calculations, have ISO certified metering that the ISO directly polls (ISO Tariff Section 10.2.1.1 and Metering BPM Section 9.3). The direct polling allows the ISO to acquire Generation, Import and Export quantities for the utility Service Area and MSS boundary. With these values in the ISO metering system (RMDAPS) the ISO calculates the utility Service Area’s Load values. Therefore, because there is no visibility into the excess BTM production, the Load value calculated and used for market settlements represents the netted Load value and not the Gross Load value discussed in this Issue Paper. The ISO will need to address this existing difference in the calculation of Load (and Generation) and determine if new submittals will be required by these entities that presently do not submit SQMD.

In summary, the Issue Paper needs to be revised to recognize that not all Load resources are “reported by the UDCs to the ISO”. The Issue Paper should also recognize that presently, the ISO does calculate Load values for some market participants (Small UDCs, MSSs and utility Service Areas) and these values, if there is excess BTM production in the territory, appear to be the netted Load values.