

## Joint EV Charging Parties Comments

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The CAISO requests your comments to the ESDER 3 proposal:

1. Measurement of behind-the-meter electric vehicle supply equipment (EVSE) load curtailment

**Comments:**

The Joint EV Charging Parties very much appreciate the progress that CAISO Staff and stakeholders have made in developing the EVSE Submetering topic.

The CAISO Straw Proposal for incorporating EVSE measurement methodologies into PDR meter data submissions continues to be workable, including:

- Unique methodologies for residential and non-residential customer accounts
- Allowance for “Load” and “EVSE” load reduction measurements within the same PDR
- Hourly event exclusion for EVSE load reduction measurements
- Elimination of the Load-Point Adjustment for EVSE load reduction measurements

The Joint EV Charging Parties acknowledge the concerns of SCE regarding the migration of EVSE load during a demand response event to receive a financial benefit; however, we have a different perspective given the expertise of Joint EV Charging Parties engaged in demand response programs in every charging use case and across the country. Demand response from EV charging is an automated demand response, or Auto-DR, technology that does not require proactive measures at the facility level to affect the load reduction. In fact, it is common that those managing or effecting the charging of a vehicle are not aware when a demand response event is occurring. As a result, the likelihood of EVSE load migration to a non-participating meter is de minimus. These concerns raised are not materially different from those originally for demand response at large as well as specifically for Meter Generator Output (MGO) participation.

The Joint EV Charging Parties looks forward to reviewing and commenting on the ESDER 3 Draft Final Straw Proposal that includes EVSE Submetering.