

# Stakeholder Comments Template

## Energy Storage and Distributed Energy Resources (“ESDER”) Stakeholder Initiative

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the Energy Storage and Distributed Energy Resources (ESDER) stakeholder initiative Draft Final Proposal posted on November 2, 2015 and as supplemented by the presentation and discussion during the stakeholder web conference held on November 9, 2015.

Submit comments to [InitiativeComments@caiso.com](mailto:InitiativeComments@caiso.com)

**Comments are due November 16, 2015 by 5:00pm**

The November 2, 2015 ESDER Draft Final Proposal may be found at:

<http://www.caiso.com/Documents/DraftFinalProposal-EnergyStorageandDistributedEnergyResources.pdf>

The presentation discussed during the November 9, 2015 stakeholder web conference may be found at:

[http://www.caiso.com/Documents/Agenda\\_Presentation-EnergyStorageDistributedEnergyResource-DraftFinalProposal.pdf](http://www.caiso.com/Documents/Agenda_Presentation-EnergyStorageDistributedEnergyResource-DraftFinalProposal.pdf)

### **Instructions:**

Please fill in the following table to indicate your organization’s overall level of support for each of the three topics areas in the 2015 scope of the ESDER initiative. To indicate level of support, please select one of the following options: (1) Fully support; (2) Support with qualification; or, (3) Oppose. Please provide an explanation of your organization’s position in the comments column. If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

Topic Area	Overall Level of Support (Fully support; Support with qualification; or, Oppose)	Comments (Explain position)
Proposed enhancements to the non-generator resources (“NGR”) market participation model	Fully Support	<p>The proposed changes and clarifications on the NGR model for the 2015 ESDER effort are sufficient given the current level of NGR participation in the market. In particular, clarifications to the treatment of NGR in the CAISO market optimization will hopefully serve to induce broader participation by DER NGRs in the CAISO market.</p> <p>Full support is predicated on continued development and consideration of additional NGR changes in the 2016 stakeholder process and in particular PDR-NGR construct that will allow the more prevalent deployment of DER BTM resources opportunities for participation in the regulation products.</p>
Proposed enhancements to demand response performance measures and statistical sampling for the proxy demand resource (“PDR”) and reliability demand response resource (“RDRR”) market participation models	Support with qualification	<p>The proposed enhancements begin to address some of the issues that have surfaced with actual market participation of behind the meter DER resources. In particular, measurement of emerging technology resource participation behind a whole premise retail meter may not accurately reflect the actual performance of that resource in response to the market dispatch. The Meter Generator Output (MGO) model(s) that have been fleshed out in the stakeholder initiative are a positive development but still impose barriers to entry when they require a CAISO or LRA grade meter. There are extremely accurate measurement devices that should be considered as a basis for performance measurement especially in the case were aggregations of small installations, e.g. vehicle chargers, that can contribute to grid reliability through market participation only if they don’t have the burden of utility grade metering. If not now, certainly in the future, there needs to be a serious look at establishing criteria for alternative performance measurement devices and rules for their use in market settlement.</p>
Proposed clarifications to rules for non-resource adequacy multiple-use applications (provision of retail, distribution and wholesale services by the same resource)	Support with qualification	<p>Olivine supports the first phase of consideration of multiple-use applications with the understanding that the complexities at the intersection of concurrent retail and wholesale participation is challenging and will continue to be worked on in subsequent phases or other stakeholder initiatives. In particular, deferral of removing the requirement to settle in all intervals rather than market activity intervals (consistent with PDR/RDRR) to the 2016 discussion leaves us with an unknown outcome. We also strongly advocate for continued effort in 2016 to develop a PDR-NGR “hybrid” that will expand BTM participation consistent with other ISO/RTO’s.</p>

