

**Excess Behind the Meter Generation
Issue Paper**

Submitted by	Organization	Date Submitted
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Comments of San Diego Gas & Electric

San Diego Gas & Electric (SDG&E) thanks the CAISO for the opportunity to comment on the CAISO’s “Excess BTM Production Issue Paper.” Overall, SDG&E believes that CAISO is on the right track and has provided two workable options for dealing with exported BTM energy. SDG&E does have two concerns with the proposals: implementation of any changes to our meter reporting and timing of any protocol changes.

Specifically, SDG&E wants CAISO to clarify what the LSEs are to report: gross load like in Table 4 Sum Load of 6 MW or load netted from BTM production not in excess of on-site load as Table 4’s Metered Load of 5 MW? SDG&E is concerned about reporting gross BTM production, as this would be difficult. Reporting excess BTM production is possible but will require changes to our metering process and systems.

For the CAISO’s first proposed solution, treating excess BTM production as generation, SDG&E is concerned that 5 min granularity will not be possible. SDG&E would recommend that CAISO consider having the LSEs provide the data hourly and divide by 12 to meet the 5 min. format. Alternatively, CAISO could allow hourly reporting as an exemption per Tariff 10.4.4.2.

For the CAISO’s second proposed solution, treating excess BTM production as negative load, SDG&E feels that this makes the most sense and will likely be the easiest to implement. SDG&E does not think there is anything in MRI-S that would prevent Market Participants from submitting negative load. Additionally, SDG&E does not think there are any Validation Errors that would appear to apply. If this option is chosen SDG&E recommends that CAISO provide the LSEs with sufficient time to test the MRI-S submittal process through Market Simulation or that CAISO perform internal testing and publish the results.

SDG&E also seeks confirmation from the CAISO that the issue paper does not propose to treat the excess BTM production as part of Unaccounted for Energy credits (UFE) but rather as an aggregate market supply (generator or negative load) modeled at the LSE DLAP. SDG&E would also like CAISO to clarify how it proposes to treat distribution losses. The issue paper fails to indicate how losses would be treated under either proposal.

Finally, the Issue Paper also indicates that CAISO will seek Board approval expected Q1 2019. SDG&E will need time to implement and test changes to our meter reporting. Since Board approval isn’t likely until 2019 and changing and testing our meter reporting would be a lengthy process we likely wouldn’t be able to report changed data the until 2020 at the earliest.