

Stakeholder Comments Template

Submitted by	Company	Date Submitted
Barbara R. Barkovich Barbara@barkovichandyap.com (707) 937-6203	California Large Energy Consumers Association	June 9, 2016

Please use this template to provide your comments on the ESDER Phase 2 stakeholder initiative Straw Proposal posted on May 24 and as supplemented by the presentation and discussion during the stakeholder web conference held on May 31.

Submit comments to InitiativeComments@CAISO.com

Comments are due June 9, 2016 by 5:00pm

The Straw Proposal posted on May 24 and the presentation discussed during the May 31 stakeholder web conference may be found on the [ESDER Phase 2](#) webpage.

Please provide your comments on the Straw Proposal topics listed below and any additional comments you wish to provide using this template.

NGR enhancements

The CAISO is proposing to explore two areas of possible NGR enhancement: (1) represent use limitations in the NGR model and (2) represent dynamic ramping in the NGR model.

The CAISO is requesting stakeholders provide comments in each of these two areas.

Comments:

CLECA finds these two areas of enhancement appear reasonable but will leave further detail to the storage and utility stakeholders.

Demand response enhancements

Two stakeholder-led work groups are up and running within ESDER 2 to explore two areas of potential demand response enhancement:

- Baseline Analysis Working Group – Explore additional baselines to assess the performance of PDR when application of the current approved 10-in-10 baseline methodology is sufficiently inaccurate.
- Load Consumption Working Group – Explore the ability for PDR to consume load based on an ISO dispatch, including the ability for PDR to provide regulation service.

The CAISO is requesting stakeholders provide comments in each of these two areas.

Comments:

CLECA supports the approach being taken by the Baseline Analysis Working Group. It is thoughtful and appears to be addressing the key baseline issues.

CLECA supports the approach being taken by the Load Consumption Working Group and agrees that the retail/wholesale interface issues are challenging.

CLECA intends to be involved in the further activities of these working groups.

Multiple-use applications

The ISO has not yet identified specific MUA issues or topics that require treatment in ESDER 2. The ISO proposes to continue its collaboration with the CPUC in this topic area through CPUC Rulemaking 15-03-011. If an issue is identified that should be addressed within ESDER 2 the ISO can amend the scope and develop a response.

The ISO is requesting stakeholders provide comments on this topic area as well as this proposed approach.

Comments:

CLECA believes that the CAISO's proposal to address these issues in collaboration with the CPUC via R. 15-03-011 is appropriate. Since some of the major issues have to do with the wholesale/retail interface and the use of storage for non-grid applications, having both organizations looking at the issues together simply makes sense. CLECA appreciates the

CAISO’s willingness to entertain issues that may subsequently be brought up for the ESDER 2 stakeholder process if any appear to fit into that process.

Distinction between charging energy and station power

The ISO proposes to seek Board approval in two ways:

- To revise the ISO tariff definition of station power to exclude explicitly charging energy (and any associated efficiency losses); and
- Permit the ISO to revise its tariff later to be consistent with IOU tariffs, as needed, in the event that they revise their station power rates.

The CAISO is requesting stakeholders provide comments on this proposed approach.

Comments:

CLECA supports the ISO’s proposal as being entirely reasonable given the current legal context.

Other comments

Please provide any additional comments not associated with the topics above.

Comments:

[\[insert comments here\]](#)