

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your written comments on the ESDER Phase 2 stakeholder initiative Third Revised Straw Proposal posted on April 17, 2017.

Submit comments to InitiativeComments@CAISO.com

Comments are due May 18, 2017 by 5:00pm

The Third Revised Straw Proposal posted on April 17, 2017 and the presentation discussed during the May 4, 2017 stakeholder conference call can be found on the [ESDER Phase 2](#) webpage.

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

1. Alternative Baselines to Enhance Demand Response

Section 5.1.3 of the Third Revised Straw Proposal provides the alternative baselines proposal that was developed by the Baseline Analysis Working Group (“BAWG”). The CAISO requests that stakeholders provide comments on the proposal in the following areas:

- a) Do stakeholders support the BAWG’s recommended baselines for adoption by the CAISO?

Yes. The California Large Energy Consumers Association (CLECA) supports the BAWG's recommended baselines. CLECA's representative participated in the BAWG and found the analysis to be thorough and adequate to support the recommendations.

- b) Does the BAWGs proposal report, April 4, 2017 version, provide the necessary level of detail for demand response providers to implement the proposed baseline options?

Comments:

Yes. The report is quite detailed and provides sufficient information about accuracy and precision to support its recommendations.

We also note that there is a proposal in the Southern California Edison Company Application for DR programs for the years 2018-2022 (A. 17-01-018) at the California Public Utilities Commission to reprogram meters of non-residential customers participating in DR Programs from 15-minute to 5-minute data and for residential customers from 60-minute data to 15-minute data. This should also increase the accuracy of the settlement calculation. The CAISO could support such reprogramming in that proceeding to address concerns raised on page 14 of the Revised Straw Proposal.

CLECA believes that the pre-established approval process and auditing of DRP settlement calculations will be important to provide assurance that these are being performed correctly.

2. Distinguishing between Charging Energy and Station Power

Section 5.2.3 of the Third Revised Straw Proposal provides the station power proposal developed by the CAISO. The CAISO requests that stakeholders provide comments on the proposal in the following areas:

- a) Given that the California Public Utilities Commission ("CPUC") has issued a Decision on its Track 2 storage issues, it is prudent for the CAISO to seek feedback from stakeholders on what changes should be made to the CAISO tariff in light of potential changes to retail tariffs.
- b) The CAISO believes that it also may be prudent to reduce the amount of verbiage in the CAISO's station power definition. A simpler approach for the CAISO's purposes could be to define station power simply as energy to serve load located on a generating unit site and jurisdictional to the local regulatory authority and settled pursuant to a retail tariff. The CAISO request stakeholder feedback on this subject.
- c) Based on the current CPUC Decision on its Track 2 storage issues, the CAISO's principal concern is that there could be potential for storage resources to "commingle" their

charging load and station power load. The CAISO requests stakeholder feedback on what CAISO tariff revisions will be necessary to ensure that this issue does not arise. One solution could be to require that all wholesale load and retail load be metered completely separately. The CAISO is interested in other potential solutions that would not require separate metering and clear electrical bifurcation of loads.

Comments:

CLECA has no comments on this proposal.

3. Net Benefits Test

Section 5.3.1 of the Third Revised Straw Proposal provides the net benefits test proposal developed by the CAISO. The CAISO requests that stakeholders provide comments on the proposal.

Comments:

CLECA does not oppose this proposal but we do raise one question. Since the EIM is a real-time market, would the DR that could be provided only be in the real-time energy market? This is not clear from the statement of the issue.

4. Increase Load Consumption as Demand Response Enhancement

Section 6.1.4 of the Third Revised Straw Proposal provides an update on the status of work on this topic. The CAISO believes that there are several first priority policy issues that must be addressed before a wholesale load consumption product can be developed. The CAISO looks forward to collaborating with the CPUC and Load Consumption Working Group to help resolve these fundamental issues and develop a path forward for designing and implementing a bi-directional Proxy Demand Response product. The CAISO requests that stakeholders provide comments on the discussion in Section 6.1.4.

Comments:

CLECA has participated in the Load Consumption Working Group and agrees that more time is needed to finalize its proposals.

5. Non-Generating Resource Enhancements

Section 6.2.4 of the Third Revised Straw Proposal provides an update on the status of work on enhancements to the non-generating resource model. The CAISO requests that stakeholders provide comments on the discussion in Section 6.2.4.

Comments:

CLECA has no comments.

6. Multiple-Use Applications

Section 6.3.3 of the Third Revised Straw Proposal provides an update on the status of work on multiple-use applications. The CAISO requests that stakeholders provide comments on the discussion in Section 6.3.3.

Comments:

[CLECA has no comments.](#)

7. ESDER Phase 3

Section 7 of the Third Revised Straw Proposal provides a discussion about the topics that the CAISO currently anticipates will be within the scope of a third phase of the ESDER initiative. The CAISO requests stakeholder input on additional topics that could be included in the scope for ESDER phase 3.

Comments:

[CLECA has no additional topics to recommend for ESDER 3.](#)

8. Other comments

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

Comments:

[Please see our comments about more granular SQMD for DR settlement under the baseline questions above.](#)