

## Joint EV Charging Parties ESDER 3 Straw Proposal Comments

Submitted by	Company	Date Submitted
David Schlosberg ( <a href="mailto:david@emotorwerks.com">david@emotorwerks.com</a> )	eMotorWerks	March 7, 2018
Anthony Harrison	ChargePoint	
Suresh Jayanthi	Chanje Energy	
Abdellah Cherkaoui	Volta Charging	

### 1. Demand Response

- New bidding and real-time dispatch options for demand response (DR)
- Removal of the single load serving entity (LSE) aggregation requirement and the need for application of a default load adjustment (DLA)
- Load shift product for behind the meter (BTM) storage
- Measurement of behind the meter electric vehicle supply equipment (EVSE) load curtailment

#### **Comments:**

The Joint EV Charging Parties very much appreciate the inclusion of the EVSE load curtailment topic in the straw proposal. The degree of interest in this important topic from stakeholders was very welcome and reinforces the importance of vehicle-grid integration as transportation electrification undergoes dramatic growth in California due to consumer demand and policy initiatives.

The Joint EV Charging Parties suggests the following topics for EVSE load curtailment working group discussion:

1. Select concise terminology for this EVSE metering participation type under Proxy Demand Resource model
2. Identify the data elements required for submission to the new meter data submission process for trade settlements
3. Required Demand Response Registration Submission (DRRS) location data entry fields and other DRRS considerations, including any new elements or drop-down fields, if any, when using EVSE metering

4. Meter data management practices for validation and editing of EVSE metered amounts, for example, treatment of net export intervals recorded by utility meters and native interval measurements of differing lengths
5. Adaptation of the existing baseline methodologies for metered EVSE, for example, elimination of the load point, or “day-of,” adjustment as is the case for the Metering Generator Output (MGO) model.
6. Revenue-grade, embedded EVSE metering standards and associated requirements for use in ISO settlements
7. Required attestations and certifications, if any, accompanying use of EVSE metering for settlement purposes.

The Joint EV Charging Parties suggests the following topics for the load shift working group discussion:

1. Establish adaptable load shift confirmation process. For example, alternative approaches to a requirement for symmetric “generation” to qualify. Load shift should focus on direct metering of beneficial shifts in time, and potentially place, of inevitable consumption.
2. Allow for, but do not require, adaptation of existing baselines methodologies to measure load shift, so that extensions of load shift to different consumption types in the future.

David

The Joint EV Charging Parties believes there is consensus for the removal of the DLA and the CAISO establishing an NBT check on all bids in order to enable multi-LSE aggregations. The Joint EV Charging Parties proposes that the CAISO examine whether this adjustment could be implemented immediately following Tariff approval rather than subsequent to BPM development and implementation.

## 2. Multiple-Use Applications

- The CAISO proposes to perform a comprehensive review and analysis of what is needed to facilitate the rules and framework established in the MUA ruling.

### **Comments:**

The Joint EV Charging Parties suggests the CAISO include in its review and analysis potential resource types that may use the NGR model other than stationary energy storage, such as electric vehicle service equipment, that would have certain use periods which are available for market participation and others that are not reasonably available.

## 3. Non-Generator Resource

- The CAISO proposes to develop a process to define use-limited status for NGRs.
  - What are the potential use-limited qualifying factors and types of documents to qualify use-limitation?

**Comments:**

The Joint EV Charging Parties have no comments on this topic at this time.