

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

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

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	Support with a request for additional information	NRG supports (1) allowing Scheduling Coordinators to submit the Non-Generator Resource’s (NGR’s) initial State of Charge (SOC) as a bid, and (2) allowing a use-limited NGR to self-manage its SOC and use-limits without having the CAISO manage those things through its market optimization. However, the CAISO has not yet provided a satisfactory explanation as to why an NGR that is self-managing its SOC and use limits must telemeter its SOC to the CAISO. The CAISO asserts that this is necessary for “resource performance monitoring”, but has not adequately described what it means by “resource performance monitoring”. NRG requests the CAISO provide additional information on what “resource performance monitoring” means.
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	The CAISO proposal to determine the “retail” baseline of a behind-the-meter generator in order to address the “wholesale-retail” overlap seems a rational approach. However, the reasonableness of this approach will depend on the accuracy of the “retail” baselines. NRG proposes that, after the CAISO has gained some experience with these “retail” baselines, the CAISO report back to its market participants in aggregate, or through other means that mask the identities of the affected market participants, on the development of these “retail” baselines, so that market participants can verify that these “retail” baselines are accomplishing their intended purposes.
Proposed clarifications to rules for non-resource adequacy multiple-use applications (provision of retail, distribution and wholesale services by the same resource)	Support with qualifications	NRG supports the CAISO’s modifications to certain rules governing aggregations that had been previously developed in the Distributed Energy Resource Provider (DERP) stakeholder process, namely, to relax the requirements that (1) multi-Pnode aggregations must be made up of the same type of resources and (2) all of those resources must move in the same direction in response to a CAISO dispatch instruction. NRG fully supports these modifications. The proposal to require that all Distributed Energy Resource Aggregations submit settlement-quality meter data to the CAISO in all settlement intervals, and be settled by the CAISO in all settlement intervals, is problematic. However, NRG greatly appreciates the CAISO’s commitment to revisit this proposal in ESDER Phase 2, and looks forward to those discussions.