

Stakeholder Comments Template

Energy Storage and Distributed Energy Resources (“ESDER”) Stakeholder Initiative

Submitted by	Company	Date Submitted
Robert Anderson Olivine, Inc. randerson@olivineinc.com	Olivine, Inc.	1/14/2016

Please use this template to provide your comments on the Energy Storage and Distributed Energy Resources (ESDER) stakeholder initiative Revised Draft Final Proposal posted on 12/23/15 and as supplemented by the presentation materials and discussion during the stakeholder web conference held on 01/07/16.

Submit comments to InitiativeComments@caiso.com

Comments are due January 14, 2016 by 5:00pm

The 12/23/15 ESDER Revised Draft Final Proposal may be found at:

<http://www.caiso.com/Documents/RevisedDraftFinalProposal-EnergyStorageDistributedEnergyResources.pdf>

The presentation materials discussed during the 01/07/16 stakeholder web conference may be found at:

CAISO Revised Agenda and Presentation:

http://www.caiso.com/Documents/Agenda_Presentation-EnergyStorageDistributedEnergyResources010616.pdf

SCE Proposed Modification to the MGO proposal:

<http://www.caiso.com/Documents/SCEProposedModificationtoMeterConfigurationB2.pdf>

Instructions:

Listed in the following table (see first column) are the ESDER proposals requiring tariff changes and ISO Board approval (specifically two NGR enhancements plus the MGO proposal), as well as the proposal to support use of statistical sampling which does not. Please fill in the necessary information (see second and third columns) to indicate your organization’s overall level of

support for each proposal. 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.

Proposal		Overall Level of Support (Fully Support; Support With Qualification; or, Oppose)	Comments (Explain position)
Allow an NGR resource to provide its initial state of charge (SOC) as a bid parameter in the day-ahead market.		Fully Support	
Allow an NGR resource the option to not provide energy limits or have the ISO co-optimize an NGR based on the SOC.		Fully Support	
Allow a PDR/RDRR resource the option of a performance evaluation methodology based on Metering Generator Output (“MGO”) concepts.	As proposed.	Support with qualification	Note that we fully support this proposal and accept the alternative proposal by SCE. We are concerned that the sub-metered load case was not considered as a part of this proposal. From the CAISO perspective, we believe that allowing the flexibility of storage in a sub-metered configuration is a more challenging use case for the CAISO to accept that that of sub-metered load. That said, it is Olivine’s position that sub-metered load may be utilized for PDR as long as the local regulatory authority agrees.
	With modification proposed by SCE.	Support with qualification	Olivine understands the motivation for SCEs modification and we do not oppose it; the only qualification being that the NBT itself is a poor protection against daily dispatch, depending on the market circumstances between the time the NBT was set and actual market clearing prices. Note that our qualification noted for the other option applies here as well.
Proposal to support use of statistical sampling		Fully Support	