
PG&E Review of PL User Guide

Specific Comments	Response
<p>Section 1.1 -- should add comment (or footnote) mentioning that some of the requirements defined in this document may be relaxed and the CAISO is working with UDC and their proposed Pilot programs on possible modifications.</p>	<p>There will be a Pilot DR agreement. No need to modify the PL Users' Guide.</p>
<p>Section 2 -- there is a statement "In the RUC process, the day-ahead PL schedule is used as the forecast for PL's consumption so that RUC will factor PL in and not over-commit resources". Need to have a better explanation on how the CAISO is generating a load forecast (in theory without the PL load) and then adding the PL schedules back to it. I don't understand how the CAISO will forecast load without PL, especially if PL load does not provide telemetry. More detail is needed on how they will accomplish this.</p>	<p>CAISO treats max PL bid in DAM as PL forecast, carves it out of the UDC load and adds back in the max of PL that clears as load or Non-Spin</p>
<p>Also, this section indicates a policy that there will be no RUC participation for the PL DR - unless this policy has already been adequately justified by the CAISO we should have it. There is value in having RUC participation and I am not sure why the CAISO can't accommodate this if they can accommodate PL DR as non-spin. (and Section 5.2)</p>	<p>There is no <u>process</u> in Release 1 to manage PL in RUC. This capability will exist in the enhancements the CAISO is making to its market design.</p>
<p>Section 3.2, Table 1. This indicates that a PLA can take up to 30 days. How long does the CAISO estimate it will take to modify the PLA to bring new loads in, and old loads out, changes to the election of CLAPs or other changes to the resources under the PLA? The CAISO should include the times/timeline for on-going maintenance of the PLA, in addition to the initial start up (as they have done).</p>	<p>(a) If the PL shift does not involve changes in telemetry and/or metering requirements, then this can be taken care of by a Master File update or if load changes hands, PL secondary market registration process</p> <p>(b) If new PL, or a shift that requires new telemetry and/or metering, then need new PLA.</p>
<p>Section 3.4 -- as written, the paragraph states "after execution of a Participating Load Agreement, the Load Aggregator must complete the ...the RDT for each PL resource it desires to initiate. Upon CAISO approval of the requested Custom LAP for each PL resource, the load aggregator will receive a unique resource ID for load ...and a unique resource ID for associated pseudo-generator".. This seems a bit circular. The PLA has a schedule 1, which list the resources along with the resource ID. When you submit a RDT, you put in the resource ID and associated parameters for the ID. So how can you exercise a PLA and also submit RDT without having the resource IDs?</p>	<p>A correction has been made to make the submission of the RDT concurrent with the PLA submission.</p>

Section 3.5.2 -- no mention if the pseudo-generator ID is used to submit the bid for real-time imbalance energy market or do you use the load ID to submit this bid? Also this states "the resource must state its maximum Demand available for curtailment in response to CAISO's real-time dispatch instructions. The resource may then bid ...". How is this "stated" and "when"? This is confusing and should be clarified by the CAISO.

Section Edited. Thanks for the comment.

Section 4.1 - indicates hourly metering intervals for PL that will not participate in A/S or real time energy. This interval seems pretty big; is this too broad for something wanting to be a PL? (the PL could conceivably front load or back load the DR within the hour, does this matter to the CAISO?).

The metering interval must match the market the PL participates in. The hourly metering will cause no issue as long as the resource is not participating in the A/S and therefore is not subject to real-time Energy dispatch.

Section 5.1 states the "CAISO may adjust the A/S and real-time imbalance energy requirements temporarily", why is this here? It seems too generic. And if it needs to be here, what specifically does it mean for the PL DR.

Agreed and paragraph is deleted in the revised document.

Section 5.2 I think we should consider adding the UDP provisions to PL DR that fails to curtail (recognizing curtailments on the other side i.e. below schedule, are never a problem - and per FERC), consistent with generation resource UDP (uninstructed deviation penalties). Signing up as a PL should mean that your level of commitment is somewhat higher than other DR.

The MRTU Tariff currently exempts Curtailable Demand from UDP (section 11.23 (c)). That exempts PL from UDP. CAISO would need to monitor the performance of PL and may suggest measures (possibly UDP) through a stakeholder process and the MSC discussion.

Section 5.2.1 -- this is the first time that the words "non-Participating load bid" is used. Why only in this section and everywhere else it states "participating load bid". Also the CAISO now references PL modeled at an "individual node", they need to revise to be consistent with 'custom lops' (made up of one or more individual nodes).

Agreed and text is edited accordingly

General -- most of the meters for DR will be connected to distribution lines. There is a lot of discussion in various sections of this document about telemetry, comparing meters to telemetry to prove the resource did response, etc. However, there is no discussion in the document about how DLF will be used for adjustment, if any. Will there be an adjustment to telemetry? How would those adjustments be compared to the meter, which per RQMT need to be adjusted by posted DLF by UDC area? I think there needs to be some discussion re the DLFs and what is applied where.

The use of DLF has been incorporated for the SC Metered Entities.

*DLF (Distribution Loss Factor):
Distribution Loss Factor represents the average electrical energy losses incurred when electricity is transmitted over a distribution network. DLF is represented as a*

*percentage of energy transmitted.
For the purposes of the CAISO PL,
the DLF represents losses between
the PL meter and the associate
CAISO Pricing Point (substation
connecting the load to the CAISO
controlled grid), i.e. the Point of
Delivery.*

