



Kathrin Sears, Chair  
County of Marin

Tom Butt, Vice Chair  
City of Richmond

Bob McCaskill  
City of Belvedere

Alan Schwartzman  
City of Benicia

Sloan C. Bailey  
Town of Corte Madera

Greg Lyman  
City of El Cerrito

Barbara Coler  
Town of Fairfax

Kevin Haroff  
City of Larkspur

Garry Lion  
City of Mill Valley

Brad Wagenknecht  
County of Napa

Denise Athas  
City of Novato

Carla Small  
Town of Ross

Ford Greene  
Town of San Anselmo

Genoveva Calloway  
City of San Pablo

Andrew McCullough  
City of San Rafael

Ray Withy  
City of Sausalito

Emmett O'Donnell  
Town of Tiburon

Marin Clean Energy  
1125 Tamalpais Avenue  
San Rafael, CA 94901

1 (888) 632-3674  
[mceCleanEnergy.org](http://mceCleanEnergy.org)

Dear CAISO Board of Governors:

Marin Clean Energy (MCE) would like to express its support for the Draft Final Proposal (Proposal) of the Expanding Metering and Telemetry Options Supplement. MCE appreciates the hard work CAISO has put in to developing the Proposal, which will help enhance California electricity consumers' ability to leverage Distributed Energy Resources (DERs).

MCE is the first operational Community Choice Aggregator (CCA) in California, and serves over 176,000 customer accounts in its territory. MCE's customers receive generation service from MCE, and transmission, distribution, and billing services from PG&E. MCE's service territory includes the County of Marin, unincorporated Napa County, and the cities of Benicia, El Cerrito, Richmond, and San Pablo. In addition to providing generation service, MCE is developing its integrated demand-side program, which includes its existing Energy Efficiency (EE) program and several Demand Response (DR) pilots. MCE aims to ramp up DR resources in its territory with the goal to aggregate the resources to participate in CAISO markets. MCE also has energy storage obligation directed by the statute, and is looking to satisfy this mandate with distributed Energy Storage (ES) that can be controlled in aggregate. As such, MCE has been engaging with CAISO staff to evaluate the feasibility of its participation in various CAISO markets.

MCE supports the Proposal and recommends its implementation. Implementing the proposal will expand market access for different DER aggregations and allow small resources to provide services to CAISO markets. The narrow design of the Proposal will enhance market competition without necessitating an overhaul of the overall design, and CAISO has provided settlement examples for DERs under this new proposal. Approving the proposal will allow DERs to participate with CAISO wholesale markets, and giving stakeholders the opportunities to provide further inputs to improve the market.

Sincerely,

C.C. Song

Regulatory Analyst

Marin Clean Energy

[csong@mceCleanEnergy.org](mailto:csong@mceCleanEnergy.org) | 415.464.6018