

## Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments  
in the Energy Storage Interconnection stakeholder initiative.

Submit comments to [EnergyStorage@caiso.com](mailto:EnergyStorage@caiso.com)

Comments are due April 14, 2014 by 5:00pm

The presentation discussed during the April 7 stakeholder meeting may be found at:

[http://www.caiso.com/Documents/Agenda-Presentation-EnergyStorageInterconnectionApr7\\_2014.pdf](http://www.caiso.com/Documents/Agenda-Presentation-EnergyStorageInterconnectionApr7_2014.pdf)

The ISO is requesting that stakeholders provide comments in one or both of the following two subject areas:

1. Issues and/or questions of more immediate concern relating to the submission of interconnection requests in the Cluster 7 application window. To the extent possible, the ISO will seek to address such issues/questions prior to the close of the Cluster 7 application window (i.e., prior to April 30).
2. Policy issues that may require more comprehensive examination through this initiative. As a reminder, policy issues relating to interconnection of energy storage to the ISO controlled grid are within the scope of this initiative. In contrast, interconnection below the ISO controlled grid, and market and rate issues, are examples of subject areas not within the scope of this initiative.

To aid the ISO in differentiating between comments in these two subject areas, please insert your comments under the appropriate heading below. Thank you.

**Issues/questions of more immediate concern relating to the submission of interconnection requests in the Cluster 7 application window:**

1. Once SCE is aware of an energy storage project requesting to interconnect through the Cluster 7 application window, SCE will be able to provide the energy storage developer with a supplemental data form to ascertain additional technical specifications and operating characteristics of the proposed energy storage project. With the intent of making the scoping meeting as fruitful as possible and to have a clear understanding of the interconnection request, SCE would recommend that the energy storage developer completely respond to the questions contained therein and submit the completed data form to SCE in advance of the scoping meeting.

The supplemental data form will be ready for posting to Open Access by April 30th.

**Policy issues that may require more comprehensive examination through this initiative:**

1. A fundamental policy issue that needs to be resolved for the long-term is the handling of studies required to properly evaluate an interconnection request from an energy storage developer. The current approach of studying the generation function of the storage project under the CAISO tariff and the load function of the storage project through a separate tariff is not the most efficient approach. A primary goal of the more comprehensive review of energy storage-related issues should be to streamline the technical studies necessary to evaluate the generation and charging impacts of a proposed storage project through a single process. There is a need to develop a technical study process in such a way that the generation and charging studies are performed in an integrated manner, rather than via two separate processes.
2. An issue that is related to item 1 above, and that should also be evaluated for a possible more comprehensive long-term storage interconnection solution is whether the serial approach to studying the charging impacts of an energy storage project should be revised to harmonize with the cluster approach to studying the generation impacts. A cluster approach to studying the charging functionality of a storage project may be useful to identify any contingencies regarding network upgrades that may be required by other energy storage developers.