

December 5, 2017

**COMMENTS OF THE CITIES OF ANAHEIM, AZUSA, BANNING, COLTON,
PASADENA, AND RIVERSIDE, CALIFORNIA ON THE
DRAFT TARIFF LANGUAGE FOR THE ENERGY STORAGE AND DISTRIBUTED
ENERGY RESOURCES PHASE 2 STAKEHOLDER INITIATIVE**

In response to the ISO's request, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the "Six Cities") provide comments on the draft tariff language proposed in Phase 2 of the Energy Storage and Distributed Energy Resources ("ESDER") stakeholder initiative.

The Six Cities' comments are specifically focused on the proposed revisions to the definition of "Station Power." As proposed by the ISO, Station Power is

Retail Energy, as defined by the Local Regulatory Authority, for operating electric equipment, for the sole purpose of participating in the CAISO Markets.

Earlier in this stakeholder initiative, the ISO had determined that it would be preferable to remove the current definition of Station Power from the tariff in favor of more general language. The proposal was to define Station Power as "Energy for operating the electrical equipment of an energy resource subject to a retail tariff, as defined by the Local Regulatory Authority." (*See* Energy Storage and Distributed Energy Resources Phase 2 – Draft Final Proposal at 18.)

The Six Cities believe that stakeholders would benefit from further explanation from the ISO as to the intended purpose behind inclusion of the language "for the sole purpose of participating in the CAISO markets" in the proposed definition. The Six Cities take no position on the proposed definition at this time, but may provide further comments depending on the explanation for the definition as proposed in the tariff language.

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