

# Stakeholder Comments Template

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

Submitted by	Company	Date Submitted
Chris Edgette <a href="mailto:cedgette@strategen.com">cedgette@strategen.com</a> 415.424.8475	CESA	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](mailto: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](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	CESA very much supports the concept of the MGO, but would like to revisit the issue of “overlap” between demand charges and energy functions in ESDER 2
	With modification proposed by SCE.	Support with Qualification	SCE’s amendment effectively requires that all behind the meter resources bid at or above the NBT price. Any bid awarded below the NBT would count against the future baseline of the resource. Such a baseline structure may not be appropriate for non-CPUC-jurisdictional resources.  CESA feels that SCE’s proposal requires further discussion and review in ESDER Phase 2. However, CESA is willing to support a final draft that includes this amendment in order to move the initiative forward to the February board meeting.
Proposal to support use of statistical sampling		Fully Support	