

## Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your written comments on the ESDER Phase 3 Straw Proposal.



Submit comments to [InitiativeComments@CAISO.com](mailto:InitiativeComments@CAISO.com)

**Comments are due March 7, 2018 by 5:00pm Pacific Time**

The CAISO posted the ESDER 3 Straw Proposal on February 15, 2018 followed by a web conference on February 21, 2018. The presentation and all supporting documents can be found on the [ESDER 3](#) webpage. The CAISO requests your comments to the overall proposals scoped for ESDER3 along with the following specific questions:

### 1. Demand Response

- New bidding and real-time dispatch options for demand response (DR)
  - Are there other considerations the CAISO needs to address to ensure resources can feasibly respond to dispatches in real-time?
- Removal of the single load serving entity (LSE) aggregation requirement and the need for application of a default load adjustment (DLA)
  - Is there general consensus for the removal of the DLA and including the NBT bidding rule, to enable multi-LSE aggregations?
- Load shift product for behind the meter (BTM) storage
  - Based on the product features outlined in the straw proposal, are stakeholder aware of any CPUC regulations that need to be evaluated for

- potential change to accommodate the proposed load shift functionality (i.e. any RA conflicts)?
- Are there other product features that should be considered within the proposal?
  - Measurement of behind the meter electric vehicle supply equipment (EVSE) load curtailment
    - What additional proposal details should the working group consider and/or address as the proposal is further developed?

**Comments:**

The California Large Energy Consumers Association (CLECA) generally supports the direction the CAISO proposes for demand response (DR) in ESDER 3. While we understand the historical reasons for the single load-serving entity (LSE) requirement as they related to the Default Load Adjustment (DLA), that requirement is undermining integration of certain DR resources into the CAISO's markets and is one of the factors that has inhibited the achievement of the CPUC's goal to accomplish full integration by January 1, 2018. Since we understand that the CAISO is intending to develop a new SIBR rule to only accept bids above the Net Benefits Test (NBT) threshold price, the removal of the DLA should not create significant problems. We do understand that there are still some outstanding issues about how the NBT works in real time that were raised in the Supply Integration Working Group report of June 30, 2015 (at page 20) in R 13-09-011 at the CPUC, but we support the elimination of the single LSE requirement.

We support a broader application of the load shift product beyond behind the meter (BTM) storage with meter generator output baselines; however, we understand that the CAISO prefers to start with that particular, albeit not a more desirable technology-neutral, application. There does need to be a serious discussion of the RA value or lack thereof for the load shift product. This issue arose in the CPUC Load Shift Working Group (LSWG) on February 28. In its decision establishing the LSWG, the Commission directed the development of a product that would count for RA. The CAISO has indicated it does not believe that such a product should count for RA. This point needs to be confronted.

CLECA supports the development of the 15-minute day-of product for DR by extending the functionality available to the inerties.

We are not sufficiently familiar with the Commitment Costs and Default Energy Bid Enhancements (CCDEBE) stakeholder process to offer comments on whether and/or how it will facilitate the resolution of the start-up and minimum run time issues for DR and look forward to reading the comments of other stakeholders on this point. The start-up and minimum run time issues are very significant and do need to be addressed to prevent infeasible dispatches for proxy demand resources (PDR).

## 2. Multiple-Use Applications

- The CAISO proposes to perform a comprehensive review and analysis of what is needed to facilitate the rules and framework established in the MUA ruling.

### **Comments:**

[\[Insert comments here\]](#)

## 3. Non-Generator Resource

- The CAISO proposes to develop a process to define use-limited status for NGRs.
  - What are the potential use-limited qualifying factors and types of documents to qualify use-limitation?

### **Comments:**

[\[Insert comments here\]](#)

## 4. Other comments

Please provide any additional comments not associated with the topics above.

### **Comments:**

CLECA would like to voice a concern about the implementation of the day-ahead energy bidding option for the reliability DR resource (RDRR). This functionality was built into the CAISO's tariff design for RDRR. However, at a February 15 meeting at the CPUC of the Supply Side Working Group (SSWG), there appeared to be some uncertainty on the part of the CAISO as to how a resource that has to be available in real time on a contingency basis could be bid into the day-ahead market on a price basis. We recommend that there be some further discussion of this matter at the next SSWG meeting and perhaps in ESDER 3. It is important that all stakeholders, including those utility demand response providers (DRPs) that are attempting to create a day-ahead energy option for load providing RDRR (the latter through the Base Interruptible Program (BIP) or the Agricultural Pumping-Interruptible program (AP-I), for example), will be able to fully understand how these resources will be integrated and how settlement will occur.