# Stakeholder Comments Template

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| **Submitted by** | **Company** | **Date Submitted** |
| Please fill in the name, e-mail address and contact number of a specific person who can respond to any questions about these comments. | Please fill in here | Please fill in here |

Please use this template to provide your comments on the ESDER Phase 2 stakeholder initiative Revised Straw Proposal posted on July 21 and as supplemented by the presentation and discussion during the stakeholder web conference held on July 28.

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

**Comments are due August 11, 2016 by 5:00pm**

The Revised Straw Proposal posted on July 21 and the presentation discussed during the July 28 stakeholder web conference may be found on the [ESDER Phase 2](http://www.caiso.com/informed/Pages/StakeholderProcesses/EnergyStorage_DistributedEnergyResourcesPhase2.aspx) webpage.

Please provide your comments on the Revised Straw Proposal topics listed below and any additional comments you wish to provide using this template.

***NGR enhancements***

The CAISO has been focused on two areas of potential NGR enhancement: (1) representing use limitations in the NGR model and (2) representing throughput limitations based on a resource’s state of charge (SOC).

The CAISO is requesting stakeholders provide comments in each of these two areas.

**Comments:**

[insert comments here]

***Demand response enhancements***

Two stakeholder-led work groups are up and running within ESDER 2 to explore two areas of potential demand response enhancement:

* Baseline Analysis Working Group – Explore additional baselines to assess the performance of PDR when application of the current approved 10-in-10 baseline methodology is sufficiently inaccurate. The Working Group has completed its first phase of analysis on topics including alternative baselines and control groups.
* Load Consumption Working Group – Explore the ability for PDR to consume load based on an ISO dispatch, including the ability for PDR to provide regulation service. The working group has recommended bi-directional PDR modelling.

The CAISO is requesting stakeholders provide comments in each of these two areas.

**Comments:**

[insert comments here]

***Multiple-use applications***

The ISO has not yet identified specific MUA issues or topics that require treatment in ESDER 2. The ISO proposes to continue its collaboration with the CPUC in this topic area through Track 2 of the CPUC’s energy storage proceeding (CPUC Rulemaking 15-03-011). If an issue is identified that should be addressed within ESDER 2 the ISO can amend the scope and develop a response.

The ISO is requesting stakeholders provide comments on this topic area as well as this proposed approach.

**Comments:**

[insert comments here]

***Distinction between charging energy and station power***

In this topic area the ISO will continue its collaboration with the CPUC through Track 2 of the CPUC’s energy storage proceeding (CPUC Rulemaking 15-03-011) rather than exclusively through ESDER 2. At this time, the ISO proposes the following:

* Revise the ISO tariff definition of station power to exclude explicitly charging energy (and any associated efficiency losses); and
* Revise its tariff later to be consistent with IOU tariffs, as needed, in the event that they revise their station power rates.

The CAISO is requesting stakeholders provide comments on this proposed approach. The CAISO also seeks comments on the following:

* What rules are necessary, if any, to dictate how station power and wholesale charging energy (including efficiency losses) can be separately calculated for settlement purposes? For example, what would be the advantages and disadvantages of using meters compared to predetermined deductions?
* Assuming that station power includes all energy drawn from the grid except to charge the storage device, what specific advantages and disadvantages do storage devices have compared to conventional generators under current netting and self-supply rules?

Detailed examples comparing the generally expected dispatching of storage devices and conventional generators under current netting and self-supply rules are appreciated.

**Comments:**

[insert comments here]

***Other comments***

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

**Comments:**

[insert comments here]