

## Stakeholder Comments Template

Submitted by	Company	Date Submitted
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PG&E appreciates the CAISO’s creation of a working group to further discuss the technical issues associated with refining the load shift product and in developing an EVSE proposal. PG&E believes a working group setting is critical to further exploring these issues from a variety of perspectives and we look forward to continued collaboration in refining these proposals with stakeholders.

### 1. Measurement of EVSE Performance

In addition to the overall design elements of the EVSE measurement, please provide comments to the specific questions below:

- Does the current CAISO “Metering BPM Appendix G” requirements apply to EVSEs?
- Does the 10-in-10 customer baseline methodology capture an EVSE performance, or does the CAISO need to consider another baseline?
  - If the load point adjustment is not applied, is there another adjustment that should be considered?

**1. PG&E is still evaluating the Metering BPM Appendix G and assessing if it is sufficient to apply to EVSEs.**

**2. PG&E recommends the CAISO continue to review its performance evaluation methodologies to refine their use and report to stakeholders on their effectiveness.**

PG&E’s experience with using the MGO methodology is limited to PG&E’s submetering pilot for EVSEs.<sup>1</sup> Data quality issues have been observed and it is not yet determined whether the results are due to the MGO methodology, the sub meters, or issues associated with transferring data. Data is transferred numerous times: when the car is charging, the sub-metered data is transferred from the EVSE to the EVSP, then the data is transferred from the EVSP to the LSE, and finally the EVSP data is transferred to the CAISO. In each of these sub metered data transfer points, there are risks of transferring the data incorrectly. However, it is clear that the sub metered data eventually provided to the CAISO is not revenue quality. We are trying to understand the point(s) of failure. Nexant will be providing a program evaluation of the sub-

<sup>1</sup> Electric Vehicle Submetering Pilot Program. [https://www.pge.com/en\\_US/residential/solar-and-vehicles/options/clean-vehicles/electric/ev-submetering-pilot-program.page](https://www.pge.com/en_US/residential/solar-and-vehicles/options/clean-vehicles/electric/ev-submetering-pilot-program.page)

metering pilot with their assessment of possible issues in roughly September of 2018. However, to understand the benefits and limitations of the methodology, PG&E recommends CAISO or the Department of Market Monitoring also assess the effectiveness of performance methodologies and the data collected.

### 3. **A load point adjustment is not necessary for EVSEs.**

PG&E appreciates the revision CAISO made to the proposal for EVSEs at the Technical Working Group meeting on March 29, 2018, and agrees a load point adjustment (related to capturing temperate differences for the event and historical data) does not affect EVSE performance and should therefore not apply.

## 2. Load Shift Product

In addition to providing comments on the overall design elements of the Load Shift Product, please provide comments to the specific topics/questions below:

- Please comment on the CAISO’s proposal to establish two resource IDs and the bidding requirements for the load curtailment and consumption.
- Please provide comments on the Metered Energy Consumption (MEC) methodology
  - The CAISO presented an example that measured typical use with consideration of only the load consumption in “non-event hours” during the 10-in-10 baseline calculation and an example that considered both load curtailment and consumption; please comment on either calculation.
  - Are there other calculations that could measure typical use?

### **Comments:**

1. **PG&E understands the current requirement to establish two resource IDs as a key attribute distinguishing load shift from the non-generator resource (NGR) model, but would also highlight that this will lengthen the time it will take to register and bid these resources.** PG&E’s understanding is that CAISO designed this product with two resource IDs because if it was under one ID it would act in a continuous dispatchable range, and as a result there could be conflicting dispatches for load consumption and curtailment (possibly related to ramp rates and the net benefits test) well as settlement issues (as load consumption does not have a resource adequacy (RA) value associated with it and therefore does not have an accompanying must offer obligation (MOO), whereas load curtailment is eligible for RA and has a MOO). PG&E agrees that this design parameter is essential for this product and understands that an alternative for resources wanting to act in a continuous range would be to register under the NGR model. This creates complexity for Demand Response Providers in creating and registering two resource IDs as well as managing the bidding for a product with distinct curtail and

consumption attributes. To alleviate this, it would be helpful if CAISO could provide additional details related to the resource registration process and attributes of the master file.

**2. PG&E recommends the CAISO clarify Bid Cost Recovery rules for the load shift product.**

As Bid Cost Recovery (BCR) is designed to enable a generator to be made whole (i.e., recover deficits when they do not recover their costs during a trade day), on the surface, it is unclear how this applies for when an energy storage resource is charging based on opportunity cost. PG&E asks that the CAISO provide more examples of when BCR might be applicable for the opportunity costs associated with the charging of behind-the-meter energy storage resources.

**3. PG&E recommends the baseline to determine typical use should be calculated based on typical load increase patterns and not calculated by averaging curtailment and consumption.**

PG&E recommends that the 10-event hours used to calculate typical use will only apply to the hours for consumption. The examples provided at the working group meeting, which include both curtailment and consumption, do not achieve the result of illustrating the typical use of the battery.<sup>2</sup> Rather by averaging curtailment with load consumption the methodology does not capture typical use of the battery and therefore incorrectly identifies what is incremental. Considering the CAISO's proposal is to separate a resource into two resource IDs, logically it makes sense to have separate baselines. To the extent that a baseline is created to represent both the curtailment and consumption, then the baselines for the curtailment resource should also be changed.

**4. The creation of a Load Shift Product will necessitate equivalent to Rule 24 from the CPUC.**

PG&E would also like to flag for the CPUC that an equivalent to Rule 24 will be needed for the load shift product; Rule 24 exists today for both PDR and RDRR.

**5. Other comments**

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

**Comments:**

PG&E is concerned by the discussion about RA credit for the Load Shift Product in the CAISO's ESDER3 initiative and is aware there is also an ongoing discussion about RA value for a technology agnostic Load Shift Product in a CPUC working group. PG&E recommends the discussion about the RA value of load consuming resources be deferred to the CPUC's RA proceeding to establish the criteria and therefore applicability regarding if a load shift product should be eligible to provide flex RA.

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<sup>2</sup> Energy Storage and Distributed Energy Resources Phase 3 (ESDER 3). Straw Proposal. Technical Working Group March 29, 2018 Slides 27-29. [https://www.caiso.com/Documents/Agenda-Presentation\\_EnergyStorage-DistributedEnergyResourcesPhase3-Mar292018.pdf](https://www.caiso.com/Documents/Agenda-Presentation_EnergyStorage-DistributedEnergyResourcesPhase3-Mar292018.pdf)