

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 discussion during the March 29, 2018 technical working group.



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

**Comments are due April 9, 2018 by 5:00pm Pacific Time**

SDG&E appreciates the opportunity to provide comments on the ESDER Phase 3 technical working group meeting and presentation material. It was a helpful and constructive meeting to discuss key issues and SDG&E looks forward to future discussions.

**1. Measurement of Electric Vehicle Supply Equipment (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?

**SDG&E Comments:**

SDG&E understands that the dispatch and performance measurement of Electric Vehicle Supply Equipment (EVSE) curtailment could be simplified if the service account(s) only contained EVSEs. However, CAISO provides a scenario where the service account has both demand response (DR) load curtailment in addition to EVSE curtailment. It is not clear how CAISO would dispatch only the EVSE curtailment if the service account(s) also include regular demand

response programs. Would the Masterfile data separate out the EVSE “load curtailment” from DR load curtailment? Would the scheduling coordinator (SC) submit offers into the day-ahead market specific for EVSE curtailment and then another for DR load curtailment? If CAISO dispatch is not specific to EVSE curtailment, then what is the benefit of providing the meter data specific to the EVSE when the SC must submit the service meter data for settlement purposes?

SDG&E requests CAISO discuss the EVSE curtailment option using the non-generating resource (NGR) model instead of the PDR model. Aside from the 0.5 MW minimum and lack of resource adequacy (RA) capacity value, are there other different requirements for an entity to utilize the NGR model?

## **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 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
  - 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?

### **SDG&E Comments:**

SDG&E believes the proposal to utilize two resource IDs for the load shift product will result in a very complicated process to manage. SDG&E understands that this complication stems from the lack of resource adequacy qualifying capacity (RA QC) methodology for an aggregated NGR whereas PDRs have an established qualifying capacity (QC) methodology for an aggregated resource. Given that CAISO is limiting the net qualifying capacity (NQC) value to only the curtailment side of the product and not the consumption, establishing a QC value for an aggregated NGR seems possible. SDG&E would recommend that CAISO along with other stakeholders propose a QC methodology at the California Public Utilities Commission (CPUC) RA proceeding in the future.

In the interim, SDG&E has two primary concerns with the load shift product proposal. First, the consumption bid should not be limited to negative bid prices only. There could be positive price intervals when CAISO is curtailing renewable generation (e.g., price intervals where a renewable generator is submitting a positive price/quantity bid because it has variable O&M

costs, is not being compensated for any Renewable Energy Credits and has no other opportunity costs). While the goal is to reduce curtailment of renewable generation, CAISO should allow for increased load consumption to occur whenever it is economic. This will minimize renewable curtailment while providing efficient market outcomes. Second, bid cost recovery (BCR) payments should be paid only if the net result is negative for the two resources. CAISO should not pay bid cost recovery if the revenues of both resource IDs exceed are positive. Treating the two resources separately may result in over-payment and allow the PDR to earn revenues beyond those contemplated under the CAISO proposal.