

**Stakeholder Comments Template**

**Energy Storage and Distributed Energy Resources (ESDER) Phase 4**

This template has been created for submission of stakeholder comments on the Straw Proposal for ESDER Phase 4*.* The paper, stakeholder meeting presentation, and all information related to this initiative is located on the [initiative webpage](http://www.caiso.com/informed/Pages/StakeholderProcesses/EnergyStorage_DistributedEnergyResources.aspx).

Upon completion of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com). Submissions are requested by close of business **May 17, 2019.**

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| **Submitted by** | **Organization** | **Date Submitted** |
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**Please provide your organization’s general comments on the following issues and answers to specific requests.**

1. **Non-Generator Resource (NGR) model SOC parameter**
2. **Bidding requirements for energy storage resources**
3. **DR operational characteristics**
   1. Please provide comments on the CAISO’s three options.
4. **Variable output DR** 
   1. CAISO requests additional detail and reasoning from stakeholders who believe a more appropriate method exists for determining QC than applying an ELCC methodology.
   2. CAISO requests stakeholder feedback on controls needed to ensure that forecasts accurately reflect a resource’s capability.
5. **Non-24x7 settlement of behind the meter NGR**
   1. As a behind the meter resource under the non-generator resource model, any wholesale market activity will affect the load forecast. How will load serving entities account for changes to their load forecast and scheduling due to real time market participation of behind the meter resources?
   2. How would a utility distribution company prevent settling a resource at the retail rate when the behind-the-meter device is participating in the wholesale market?
   3. If a behind-the-meter resource is settled only for wholesale market activity, what would prevent a resource from charging at a wholesale rate and discharging to provide retail or non-wholesale services? How would this accounting work?
6. **Additional comments**

Please offer any other feedback your organization would like to provide from the topics discussed during the working group meeting.