## **ENGIE Storage**

Comments of ENGIE Storage
On
CAISO ESDER Phase 3 Issue Paper

Submitted by	Company	Date Submitted
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	(Formerly Green Charge)	

## **Comments**

ENGIE Storage Services NA, LLC, "ENGIE Storage," formerly known as Green Charge, values the opportunity to provide comment on the Energy Storage and Distributed Energy Resources (ESDER) Phase 3 scoping workshop and discussion on January 16, 2018. ENGIE Storage recognizes the CAISO for their national thought leadership and action on these issues and commends the CAISO for facilitating a process for stakeholder input. The integration of energy storage and distributed energy resources into the CAISO marketplace and removal of market barriers to participation remains a top priority for ENGIE Storage.

ENGIE Storage, formerly known as Green Charge, is a California market leader in behind-themeter energy storage with 58 MWh of energy storage currently built or under construction in the state. Headquarted in Santa Clara, California, ENGIE Storage develops, owns, and operates energy storage systems utilizing proprietary smart software to optimize energy storage system performance. In 2016 ENGIE Storage, formerly Green Charge, was acquired by ENGIE, the largest independent power producer in the world with over 150 years of power generation experience.

Founded in 2009, ENGIE Storage has pioneered use of sophisticated virtual aggregation software coupled with distributed energy storage assets to participate in market and utility programs and provide grid benefits. ENGIE Storage has participated in the Excess Supply Pilot, the Supply Side Pilot, the Demand Response Auction Mechanism and PG&E's Distributed Energy Resource Management System and Capacity Bidding (DR, non-CAISO program).

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ENGIE Storage is writing to express strong support for the high priority development of a Load Shift Product as part of the ESDER Phase 3 Scope. ENGIE Storage would like to highlight support for the presentation given by Ted Ko from Stem during the January 16<sup>th</sup> workshop. A Load Shift Product, as outlined in Stem's presentation, would enable ENGIE Storage to address current renewable curtailment and overgeneration market needs using assets already deployed in the market.

ENGIE Storage further supports Stem's proposal to push development towards a minimum viable product in this first iteration. The CAISO should avoid attempting to "boil the ocean" in a process that could significantly delay rollout while raising questions of tariff design and jurisdiction. Importantly the proposed minimum viable product will not require the CAISO to address concerns around retail metering or IOU involvement. A more limited Load Shift Product will enable the CAISO to deliver a workable product under the current timeline and leaves the door open for further innovation and iteration in subsequent proceedings.

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Thank you,

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