

Joint EV Charging Parties Comments

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The CAISO posted the ESDER 3 Revised Straw Proposal on April 30, 2018, followed by a web conference on May 10, 2018. The presentation and all supporting documents can be found on the [ESDER 3](#) webpage.

1. Demand Response

- Measurement of behind the meter electric vehicle supply equipment (EVSE) load curtailment

Comments:

The Joint EV Charging Parties appreciates CAISO’s progress in advancing the EVSE submetering for PDR participation in the Revised Straw Proposal and the May 10th web conference.

As proposed in the Revised Straw Proposal, the Joint EV Charging Parties support metering standards equivalent to those applied by the applicable LRA. In the case of the CPUC’s standards for interval metering, it is understood that two percent accuracy is the required threshold. At the time of a SQMD plan submission to the CAISO, the applicant would have to provide evidence of EVSE submeter performance and accuracy compliance and equivalence with the LRA standard.

The Joint EV Charging Parties also support the proposed performance measurement methodologies – residential baselines (5 in 10) and commercial baselines (10 in 10), event hour exclusion from baseline, elimination of load-point adjustment, and 5 minute metering

granularity.

The Joint EV Charging Parties wishes to clarify and confirm that entities seeking to utilize EVSE submetering option would have access to the same meter configuration options, with the applicable performance measurement methodologies, as currently exist for stationary storage MGO, including:

- A. EVSE only metering
- B. Rest of facility, excluding EVSE
- C. EVSE metering and rest of facility metering

Finally, the Joint EV Charging Parties would like to understand how the SQMD plan process will apply in the case of EVSE submetering for hundreds of devices with the same metering specifications and SQMD processes. After an initial SQMD plan is approved, the applicant should be able to use an approval for multiple Resource IDs and any identical device without requiring a subsequent SQMD plan approval. Further clarity on this process would be a worthwhile topic in the June 5th workshop. The Joint EV Charging Parties request participation by a CAISO representative responsible for SQMD plan approval in the workshop.

In addition, earlier comments by Joint EV Charging Parties raised questions regarding DRRS treatment of the EVSE submetering option as well as any new DRRS elements required. This topic would also be worthwhile for June 5th.