

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric Company for Recovery of Costs to Implement Electric Rule 24 Direct Participation Demand Response (U39E).	Application 14-06-001 (Filed June 2, 2014)
And Related Matters	Application 14-06-002 Application 14-06-003

COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION TO THE APRIL 27, 2015 COMPLIANCE FILING

The California Independent System Operator Corporation (CAISO) respectfully files these responsive comments to the April 27, 2015 compliance filing (Compliance Filing) submitted by Pacific Gas & Electric Company (PG&E), San Diego Gas and Electric Company (SDG&E) and Southern California Edison Company (SCE, together with PG&E and SDG&E referred to as the IOUs).

I. Introduction

As the Commission is well aware, the CAISO supports expanding demand response participation in the wholesale market and continues to work to enhance its systems to remove any impediments to participation. The CAISO believes it is important to respond to the Compliance Filing to explain what it has accomplished thus far and to detail the CAISO's plans to continue to support demand response participation in the wholesale market.

In the compliance filing, the IOUs state that there are significant functionality issues that the CAISO needs to address as soon as possible to

enable registration of a large numbers of demand response resources and facilitate greater market participation. After reviewing the issues identified in the compliance filing, the CAISO finds them to be minor compared to the numerous, significant improvements in functionality that the CAISO has already implemented and made available to market participants. The CAISO notes that the remaining issues identified by the IOUs are known and being actively addressed.

As stated in the compliance filing, in March 2015 the CAISO implemented a Demand Response Registration System¹ to facilitate automated upload of locations to support those demand response programs with large numbers of customer service accounts. The CAISO acknowledges that the allocated system memory initially challenged system performance resulting in limitations on the number of service accounts that could be automatically uploaded at one time. As is typical with system testing and implementation, problems occur, but the CAISO has a formalized process to catalogue issues, fixes, and their deployment in subsequent software releases. The specific system memory issue identified by the IOUs is being addressed pursuant to this process. Attachment A to these comments identifies the issues identified by the CAISO and market simulation participants, the CAISO's identified action plan for addressing them, and the timeframe for expected resolution. This matrix shows that there is an achievable plan for remedying all outstanding issues in a timely and effective manner.

¹ The Demand Response Registration System is also referred to as "Location API" in the IOUs' Compliance Filing.

The CAISO notes that during market simulation users often observe additional functionality that would improve the capabilities of the system. This is true for the Demand Response Registration System, and the CAISO continues to address these issues in its ongoing engagement with stakeholders. The CAISO continues to provide status reports to stakeholders on fixes and set expectations for resolution of identified issues.

II. Responses to Specific Functionality Issues Identified in the Compliance Filing

Below, the CAISO responds to the four specific functionality issues raised in the IOU's April 27, 2015 Compliance Filing:

1. **Registration gaps whenever a termination is required.** The CAISO is addressing this issue in the current scope of the Demand Response Customer Partnership Group. Requirements are currently under development with a goal to implement before summer 2016 prior to the full implementation of the next generation demand response functionality in Fall 2016.
2. **UDC Service Account Numbers (SANs) can conflict across UDCs.** This issue has been included in the scope for pre-summer 2016 release. The new design will assume, for duplication verification, that SANs are unique within a UDC instead of across UDC's, thus eliminating any potential conflicts.
3. **CAISO's process to prevent a Location from being in two or more Confirmed Registrations on the same trade date has been incorrectly implemented at the Location level as compared to the Registration level.** This issue will be addressed in the pre-summer 2016 release.
4. **Registration of large resources.** Fixes to this concern have already been deployed into production.

The CAISO is committed to the success of demand response and will continue efforts to improve system capabilities and consider policy changes

through continued engagement with stakeholders in various CAISO and Commission forums.

Respectfully submitted

By: /s/ Jordan J. Pinjuv

Roger Collanton
General Counsel
Anthony Ivancovich
Deputy General Counsel
Anna A. McKenna
Assistant General Counsel
Jordan J. Pinjuv
Counsel
250 Outcropping Way
Folsom, CA 95630
T – 916-351-4429
F – 916-351-7222
jpjuv@caiso.com

Attorneys for the California Independent
System Operator Corporation

Dated: May 29, 2015

ATTACHMENT A

DRS API MARKET SIMULATION ISSUE LOG

Issue summary	ISO planned action	Timing for resolution
After loading SCE xml containing 60K+ locations UI is unresponsive	Fix the issue with the parser unable to accommodate large files containing more than 60,000 locations	Fix deployed in production on 5/11/2015
When attempting to load the SCE XML with 60K+ locations we see multiple status results for the same batch ID.	Related to same issue as above.	Fix deployed in production on 5/11/2015
Retrieve DRRS Locations taking up to 4 minutes for 60K locations for SCE	Related to same issue as above.	Fix deployed in production on 5/11/2015
The update user on the Aggregate Locations page is incorrect.	Bug fix	Q3 2015
Add and Override response times exceed 60 seconds.	Fix the backend performance issue	Fix planned for production deployment on 5/13/2015
In single user test searching for a REG ID with 1500 locations is taking approximately 40 seconds.	Fix the backend performance issue	Fix planned for production deployment on 5/13/2015
The UI is NOT returning an error message when incorrect date formats are entered in the Start and End Date of a Location.	Update UI so that user cannot enter and submit an incorrect date	Q3 2015
A new Location record is being created when the End Date of the existing Location is updated to Sysdate.	Time element needs to be removed from the start date and end date fields.	Part of Phase 2 enhancements planned for pre-summer 2016
There is no option in the UI to export the associated Locations of an ALOC.	Include export option from the UI	Q3 2015

Issue summary	ISO planned action	Timing for resolution
Headers on LRCV profile tab intermittently misaligned vertically instead of horizontally	Resolved	Fixed prior to go-live
The UI is NOT prompting the users that the SUBLAP to UDC association is NOT correct while the Location is being created.	Additional validation on SUBLAP	Q3 2015
The LRCV shown on the summary page for the registration is not in sync with the profile for registration.	Make LRCV mandatory at the location level and sum it up to the ALOC level and then further at the registration level	Part of Phase 2 enhancements planned for pre-summer 2016
Yellow band on GUI after Copy function executed	Requires framework enhancement	Part of Phase 2 enhancements planned for pre-summer 2016
Mouse Execution Copy/Paste functionality is not working	Requires framework enhancement	Part of Phase 2 enhancements planned for pre-summer 2016