

# Stakeholder Comments Template

## Energy Storage and Distributed Energy Resources (“ESDER”) Stakeholder Initiative

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the Energy Storage and Distributed Energy Resources (ESDER) stakeholder initiative Revised Draft Final Proposal posted on 12/23/15 and as supplemented by the presentation materials and discussion during the stakeholder web conference held on 01/07/16.

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

**Comments are due January 14, 2016 by 5:00pm**

The 12/23/15 ESDER Revised Draft Final Proposal may be found at:

<http://www.caiso.com/Documents/RevisedDraftFinalProposal-EnergyStorageDistributedEnergyResources.pdf>

The presentation materials discussed during the 01/07/16 stakeholder web conference may be found at:

CAISO Revised Agenda and Presentation:

[http://www.caiso.com/Documents/Agenda\\_Presentation-EnergyStorageDistributedEnergyResources010616.pdf](http://www.caiso.com/Documents/Agenda_Presentation-EnergyStorageDistributedEnergyResources010616.pdf)

SCE Proposed Modification to the MGO proposal:

<http://www.caiso.com/Documents/SCEProposedModificationtoMeterConfigurationB2.pdf>

### **Instructions:**

Listed in the following table (see first column) are the ESDER proposals requiring tariff changes and ISO Board approval (specifically two NGR enhancements plus the MGO proposal), as well as the proposal to support use of statistical sampling which does not. Please fill in the necessary information (see second and third columns) to indicate your organization’s overall level of

support for each proposal. To indicate level of support, please select one of the following options: (1) Fully support; (2) Support with qualification; or, (3) Oppose. Please provide an explanation of your organization's position in the comments column. If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

Proposal		Overall Level of Support (Fully Support; Support With Qualification; or, Oppose)	Comments (Explain position)
Allow an NGR resource to provide its initial state of charge (SOC) as a bid parameter in the day-ahead market.		Support	
Allow an NGR resource the option to not provide energy limits or have the ISO co-optimize an NGR based on the SOC.		Support	<p>NRG appreciates the CAISO’s position to not require state-of-charge (SOC) telemetry from an NGR that has elected to self-manage its energy limitations. (12/23/15 Revised Draft Final Proposal at 17.) However, the CAISO has also reserved the right to require NGRs that “...are not self-managing their NGR resource within energy limit constraints...” to provide SOC telemetry. (Id.) If the CAISO is reserving the right (presumably, in tariff language) to require a resource to telemeter a particular operational value, the CAISO must also precisely specify (also in tariff language) how it will determine when a resource is failing to self-manage its energy constraints.</p> <p>While the CAISO is entitled to information that allows it to reliably operate the bulk power system under its operational control, an NGR is also entitled to understand to what extent the CAISO may be relying on that resource to maintain the reliability of the bulk power system under the CAISO’s operational control and to receive appropriate compensation for providing those reliability services.</p>
Allow a PDR/RDRR resource the option of a performance evaluation methodology based on Metering Generator Output (“MGO”) concepts.	As proposed.	Support with Qualification	NRG does not object to adjusting the PDR wholesale baseline to account for “retail” behavior of the BTM resource. However, NRG encourages the CAISO to begin consideration of allowing “selective” wholesale participation for NGRs similar to that allowed for PDRs today.
	With modification proposed by SCE.	Support with Qualifications	As NRG understands SCE’s proposal, the proposal is intended to (1) ascribe a resource’s energy production as “wholesale” behavior when wholesale prices, relative to the Net Benefits Test threshold price, warrant classifying that production as wholesale production; and (2) prevent a resource owner from manipulating a BTM resource’s wholesale baseline. To that end, based on NRG’s initial review of the SCE proposal, NRG believes the SCE proposal may accomplish these goals in a reasonable way. NRG offers that if the RT price

			<p>can be, on its own, considered to determine whether an “event day” is declared, what the “RT price” means should be clarified so that a single anomalous RT interval would not trigger an “event day”.</p> <p>Given the late submittal of the SCE proposal, and further given all of the “variables” involved in the SCE proposal – the resource’s DA bid, the DA and RT prices, and the Net Benefits Test Threshold, and the interplay between those variables - NRG would benefit from an opportunity to review and consider additional scenarios to verify that the SCE proposal accomplishes what NRG understands it is intended to accomplish without unintended adverse consequences.</p>
<p>Proposal to support use of statistical sampling</p>	<p>Support</p>		