



CAISO Board of Governors  
California Independent System Operator  
Folsom, California  
Via email to Stacey Karpinen (SKarpinen@caiso.com)

July 26, 2017

Dear Board of Governors,

Electric Motor Werks, Inc., (“eMotorWerks”) appreciates the continuous efforts of the CAISO and its staff to advance wholesale market participation frameworks for distribution energy resources through the ESDER Phase 1 and Phase 2 initiatives. These advancements have opened up CAISO market participation to eMotorWerks and thousands of its electric vehicle station “prosumer” customers.

To meet the Governor’s goals of 1.5 million Zero-Emission Vehicles by 2025, while contributing materially to the decarbonization of the electricity sector and the cost-effective reliability of our distribution grids, utilities and balancing authorities in California must continue to develop innovative policy frameworks and market design to unlock the potential of electric vehicles, and its associated infrastructure, to be the low-cost source of renewables integration.

The CAISO’s development of the Metering Generator Output Methodology (MGOM) for behind-the-meter stationary storage aggregations operating as a Proxy Demand Resource (PDR) is a shining example of innovative policy and market design. However, MGOM only unlocks the potential of *discharging* energy storage resources, whereas electric vehicles are primarily *charging* energy storage resources, when connected to the power grid. This is a distinct policy and market design issue from that of a potential framework to enable and compensate PDRs to provide “load consumption” as service to the CAISO market. Developing a corollary metering methodology to MGOM for charging energy storage resources to more efficiently and accurately assess the performance of electric vehicle charging would have multiple system benefits and further the burgeoning role of electric vehicles as significant economic and reliability resources to California.

Therefore, eMotorWerks intends to engage with CAISO staff and interested stakeholders between today and the next CAISO Boarding Meeting to ensure that the pursuit of a corollary metering methodology to MGOM for charging energy storage resources is within the scope of ESDER Phase 3, or through a more expedient means of CAISO policy development.

Sincerely,



Valery Miftakhov, Ph.D.  
CEO and Founder  
Electric Motor Werks, Inc.



About Electric Motor Werks, Inc.

eMotorWerks is a leader in the electric vehicle charging market with 20,000 units of residential and commercial electric vehicle charging stations installed worldwide. The Company's cloud-based software platform, JuiceNet™, enables electric vehicles to become part of the smart grid ecosystem by assisting utilities and grid operators reduce costs, ease congestion, provide demand response, and absorb low cost renewable energy to help manage potential oversupply conditions at certain times.

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