

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your written comments on the ESDER Phase 3 stakeholder initiative workshop held on January 16, 2018.

Submit comments to InitiativeComments@CAISO.com

Comments are due January 26, 2018 by 5:00pm

The CAISO held a stakeholder workshop to find consensus on the issues and identify additional topics for ESDER 3. The presentation and all supporting documents can be found on the [ESDER 3](#) webpage.

Important: The CAISO requests stakeholders comment on the current list of priorities presented at the January 16, 2018 workshop. Based on the list below, high priority items (green) are considered in scope, low priority items (yellow) will be evaluated based on stakeholder comments and CAISO resource sufficiency, and no consideration items (red) will not be included in the ESDER 3 scope. **Note that some items have been rewritten for clarification.**

List of potential scope (DR, MUA, and NGR combined)

- ◆ **Demand response modeling limitations** – Resolving the issue of RUC that leads to infeasible 5-minute dispatches and minimum/maximum run time constraint recognition.
- ◆ **Variable demand response (weather sensitive)** – Exploring bidding options that reflect the variability of DR.

- ◆ **Removing the single LSE requirement/ DLA discussion** – Remove the requirement of a single LSE for DR with a subsequent discussion on if the DLA will need to be modified.
- ◆ **Load shift product** - Development of load shift capability with a consideration of additional technologies than just behind the meter storage.
- ◆ **Comprehensive review of MUA impacts** – Review of potential tariff changes in accordance with CPUC’s ruling/ working groups (including 24x7 participation requirement impact analysis).
- ◆ **Recognition of a behind the meter resource in load curtailment** – Extending the meter generator output (MGO) model to EVSEs.
- ◆ **Use-limitation status for NGRs** – Exploring the option to allow NGRs to qualify as a use-limited resource.
 - What constitutes use-limited status for NGR resources (i.e. batteries)?
- ◆ **Bidding Costs** – What bidding costs need to be captured for NGRs? (i.e. cost based offers)
- ◆ **Establishing throughput limitations** – Creating bidding options to manage excessive cycling of NGRs.
- ◆ **Management of State of Charge (SOC)** – Considering options for the management of SOC such as a multi-stacked ancillary service bid.
- ◆ **Recognition of a behind the meter resource in load curtailment** – Extending the meter generator output (MGO) model to sub-meter and develop individual baselines to all other individual load types.
- ◆ **PDR/RDRR hybrid resource** – Exploring how a DR resource that can be economic (PDR) for a limited amount and can transfer to become an RDRR.
- ◆ **Continued discussion on use-cases for MUA** – Determining participation models for new technologies such as micro-grids through use-case scenarios.

Comments:

SDG&E appreciates the opportunity to provide additional comments for the ESDER 3 initiative’s scope. SDG&E appreciates the second workshop to prioritize the goals for the initiative.

SDG&E is generally supportive of the five high priority items and provides minor comments below.

Demand response modeling limitations: It is unclear whether the CAISO believes this issue is a lack of understanding by the demand response community and their scheduling coordinators or if there are CAISO changes that will be forthcoming from CCE3 and CCDEBE that will resolve the modeling limitation concerns. If it is the latter, then does the topic need to remain under ESDER 3 since there are no Tariff changes expected? It also appears the CAISO has the functionality within its optimization to account for limitations but the feature is not active.

SDG&E recommends including additional details on why the feature may not be active and whether activating this feature would yield favorable or unfavorable results to the CAISO market optimization, in the CAISO’s draft proposal.

Variable demand response (weather sensitive): SDG&E appreciates the inclusion of this topic for ESDER 3.

Load shift product: SDG&E supports the direction of the load shift product that is directly metered and monitored. SDG&E encourages the CAISO to consider a pure load shift product where load consumption is shifted by time in future phases.

Behind the meter Load curtailment: SDG&E supports extending the Metered Generator Output model to EVSEs only, at this time. Once the CAISO and market participants have gained experience from the EVSEs, then the CAISO can consider additional resources that are sub-metered and have the ability to provide the CAISO with performance measurement data.

MUA impacts: SDG&E strongly recommends the CAISO to include MUA and non-24x7 ISO participation for the NGR model of DERs in the initiative. The non-24x7 ISO participation is currently prioritized as yellow and not green. SDG&E believes participants should not be subject to financial settlement penalties for certain grid reliability events for which the MUA DER was designed to handle.

Other comments

Please provide any additional comments not associated with the topics above.

Comments:

[Insert comments here]