

# 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

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.		Fully Support	
Allow an NGR resource the option to not provide energy limits or have the ISO co-optimize an NGR based on the SOC.		Fully Support	In general, Stem supports the concept that NGR operators can optimize their own resource’s behaviors based on market signals from the ISO. The operator is responsible for maintaining sufficient SOC to meet its commitments. Furthermore, providing energy limits or SOC optimization for a fleet of NGRs to the CAISO would limit the flexibility of the fleet to engage in multi-use behavior.
Allow a PDR/RDRR resource the option of a performance evaluation methodology based on Metering Generator Output (“MGO”) concepts.	As proposed.	Support with Qualifications	As stated in previous comments, Stem fully supports the creation of the MGO performance evaluation methodology. The use of a directly metered baseline, as proposed is a reasonable first step in addressing the question of overlap, but Stem recommends that this should not be considered the final precedential solution. Stem looks forward to reopening the question of overlap at the start of ESDER Phase 2.
	With modification proposed by SCE.	Fully Support	Stem fully supports the modification to the MGO baseline proposed by SCE. Given the MGO baseline methodology as the current working solution for the overlap question, the use of the NBT threshold is a beneficial qualification that addresses some of the gaming concerns while not unduly limiting participants’ ability to bid in to the market. Stem is likely to be one of the largest users of the MGO methodology in the near term and has determined that the SCE modification will not materially limit or harm our participation.
Proposal to support use of statistical sampling		No opinion	