

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

Order Instituting Rulemaking to Consider
Distributed Energy Resource Program
Cost-Effectiveness Issues, Data Access and
Use, and Equipment Performance Standards.

Rulemaking 22-11-013
(Filed November 17, 2022)

**COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION ON ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING
PARTY COMMENTS ON THE SCOPE OF WORK FOR CONSULTANT
AND THE DATA WORKING GROUP**

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I. Introduction

The California Independent System Operator Corporation (CAISO) submits comments on the July 17, 2023 *Ruling Requesting Party Comments on the Scope of Work for Consultant and the Data Working Group* (Ruling) by the California Public Utilities Commission’s (Commission). The CAISO appreciates the Commission’s adding to the scope of the Data Working Group to be established in this proceeding consideration of data needed to increase the accuracy of demand forecasts. The CAISO looks forward to participating in these discussions and supports ensuring the Data Working Group defines the data needed to align with related Commission proceedings. In these comments, the CAISO provides recommendations for the scope and structure of the Data Working Group.

II. Discussion

A. The CAISO Supports Creating Sub-groups of the Data Working Group to Facilitate Discussion on Specific Use Cases.

The draft scope of work specifies that the consultant leading the Data Working Group effort will determine if organizing smaller sub-groups is beneficial. Because the use cases for distributed energy resource (DER) data described in this proceeding vary, establishing smaller sub-groups to focus on specific issues is likely beneficial. For example, the CAISO’s main use case for expanded access to DER data is to enhance the demand and uncertainty forecasts, which are essential to maintaining reliability. There is likely specific staff at state agencies and utilities

best suited for this use case versus others. The CAISO recommends that state agencies, the CAISO, and utilities be included in any sub-group discussions focused on demand forecasting. The CAISO is willing to lead discussions in any sub-group created to focus on enhancing demand forecasting. Ultimately, there may be alignment in data sought by different sub-groups for different use cases, which the consultant can consolidate in its final recommendations.

B. The CAISO Recommends Organizing Data Working Group Discussions by Technology and Program Type, and Ensuring the Scope of Work is Not Limited to DERs in Specific Programs or Under Specific Utility Rates.

To organize discussions in working groups or sub-groups, the CAISO recommends structuring discussions by DER technology and program type. There may be different challenges and needs associated with data collection and access for behind the meter (BTM) storage, electric vehicles (EVs), and time-of-use or dynamic rates. There also may be different challenges associated with data collection for DERs outside of specific Commission programs or utility rates.

The CAISO recommends the scope of work include recommendations for data collection and access for DERs outside of specific Commission or utility programs. For example, customers may adopt BTM storage outside of specific programs like the Commission's Self-Generation Incentive Program (SGIP), or customers may adopt EVs while not signed up for a specific utility EV rate. The Data Working Group should discuss options for data access and reporting on these DERs as well, which may fall outside of established programs or utility rates.

To support demand forecasting, site-specific characteristics of DERs are important data points for operational visibility. Site-specific information includes installed capacity, type of rate or program, and DER operating characteristics such as maximum duration for storage resources. The scope of work related to demand forecasting should also cover definition and collection of site-specific data points. Data collection also entails obtaining information on both and actual and expected energy usage, which is necessary to assess and predict the impacts of various rates and programs on demand.

C. The Scope of Work Should Include Recommendations on Uniform Data Sharing Platforms.

The CAISO supports the goals outlined in the draft scope of work, which include identifying the data needed to support various objectives listed in the Ruling, identifying use

cases for DER data, identifying barriers to data access, and providing recommendations or solutions to such barriers. The CAISO recommends the Scope of Work also include recommendations to leverage uniform data platforms for sharing DER data.

Existing data sharing platforms such as the California Distributed Generation Statistics (DG Stats) platform have worked well to provide a centralized source for DER data regarding certain retail programs and tariffs, and can serve as a foundation for expanding data access for other resources and programs. The scope of work for Data Working Groups should include developing recommendations for leveraging or expanding uniform data sharing platforms such as DG Stats. In addition to data access, the scope of the Data Working Groups should include considering the means by which data is transmitted to end users.

III. Conclusion

The CAISO appreciates the opportunity to provide comments on this Ruling and draft scope of work for the forthcoming Data Working Groups. The CAISO looks forward to working with Energy Division staff, state agencies, and other parties on these important issues.

Respectfully submitted

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