

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 Draft Final Proposal posted on November 2, 2015 and as supplemented by the presentation and discussion during the stakeholder web conference held on November 9, 2015.

Submit comments to InitiativeComments@caiso.com

Comments are due November 16, 2015 by 5:00pm

The November 2, 2015 ESDER Draft Final Proposal may be found at:

<http://www.caiso.com/Documents/DraftFinalProposal-EnergyStorageandDistributedEnergyResources.pdf>

The presentation discussed during the November 9, 2015 stakeholder web conference may be

found at: http://www.caiso.com/Documents/Agenda_Presentation-EnergyStorageDistributedEnergyResource-DraftFinalProposal.pdf

Instructions:

Please fill in the following table to indicate your organization’s overall level of support for each of the three topics areas in the 2015 scope of the ESDER initiative. 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.

Topic Area	Overall Level of Support (Fully support; Support with qualification; or, Oppose)	Comments (Explain position)
Proposed enhancements to the non-generator resources (“NGR) market participation model	No comment	No comment.
Proposed enhancements to demand response performance measures and statistical sampling for the proxy demand resource (“PDR”) and reliability demand response resource (“RDRR”) market participation models	Qualified support.	<p>We support the proposed addition of Baseline Type 2 statistical sampling for DR resources using load without sufficiently granular interval meter data for participation in the wholesale markets. We also strongly urge the CAISO to address the control group alternative as early as possible in 2016; this alternative should help enable greater participation by residential customer aggregations in the CAISO markets.</p> <p>We support the creation of MGO options as proposed but remain concerned about the implications of dual use of BTM storage or supply resources for retail purposes like peak-shaving and also for wholesale market participation. The proposal to develop a look-back “baseline” for retail market activity appears to be the best available approach at this time. However, setting the “baseline” to zero if there are less than 5 weekday non-event days or less than 4 weekend non-event days in the last 45 days is a compromise that really does not get to the heart of our concern about double compensation and will probably be considered to allow too few non-event days for the storage representatives. We do understand the need for companies with SCE contracts to have something in place before they start operations. This is why we had asked for a solution that was temporary until the broader policy issues surrounding joint wholesale-retail participation could be addressed by the LRA in conjunction with the CAISO. The CAISO says it will consider changes after there is experience with such projects, but we are concerned about how much detail of the options will be incorporated into tariff language. If what is likely to be an interim solution is locked into the CAISO’s tariff, it will be very difficult to change it in the future.</p>
Proposed clarifications to rules for non-resource adequacy multiple-use applications (provision of retail, distribution and wholesale services by the same resource)		CLECA has no comments other than to encourage the consideration of bi-directional PDR in 2016 and close coordination with LRAs on retail/wholesale market issues going forward.

