

Submitted by	Company	Date Submitted
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eMotorWerks appreciates the opportunity to comment on the Third Revised Straw Proposal in Phase 2 of the ESDER Initiative and suggest further enhancements for consideration in ESDER Phase 3. eMotorWerks has also submitted joint comments with Stem, Inc. on certain topics at issue.

### 1. Alternative Baselines to Enhance Demand Response

Section 5.1.3 of the Third Revised Straw Proposal provides the alternative baselines proposal that was developed by the Baseline Analysis Working Group (“BAWG”). The CAISO requests that stakeholders provide comments on the proposal in the following areas:

- a) Do stakeholders support the BAWG’s recommended baselines for adoption by the CAISO?
- b) Does the BAWG’s proposal report, April 4, 2017 version, provide the necessary level of detail for demand response providers to implement the proposed baseline options?

#### Comments:

eMotorWerks is supportive of the BAWG’s recommended baseline options for the residential customer segment. The proposal may require additional detail for DRPs to implement, specifically treatment of residential and non-residential customers in the same PDR Resource. In addition, further clarification on how to determine which customer location is or qualifies as residential vs non-residential is necessary for implementation.

### 2. Distinguishing between Charging Energy and Station Power

#### Comments:

[Please see joint comments of Stem and eMotorWerks.](#)

### 3. Net Benefits Test

**Comments:**

[eMotorWerks has no comments at this time](#)

### 4. Increase Load Consumption as Demand Response Enhancement

Section 6.1.4 of the Third Revised Straw Proposal provides an update on the status of work on this topic. The CAISO believes that there are several first priority policy issues that must be addressed before a wholesale load consumption product can be developed. The CAISO looks forward to collaborating with the CPUC and Load Consumption Working Group to help resolve these fundamental issues and develop a path forward for designing and implementing a bi-directional Proxy Demand Response product. The CAISO requests that stakeholders provide comments on the discussion in Section 6.1.4.?

**Comments:**

[Please see joint comments of Stem and eMotorWerks.](#)

### 5. Non-Generating Resource Enhancements

Section 6.2.4 of the Third Revised Straw Proposal provides an update on the status of work on enhancements to the non-generating resource model. The CAISO requests that stakeholders provide comments on the discussion in Section 6.2.4.

**Comments:**

[Please see joint comments of Stem and eMotorWerks.](#)

### 6. Multiple-Use Applications

Section 6.3.3 of the Third Revised Straw Proposal provides an update on the status of work on multiple-use applications. The CAISO requests that stakeholders provide comments on the discussion in Section 6.3.3.

**Comments:**

[eMotorWerks has no comments at this time](#)

## 7. ESDER Phase 3

Section 7 of the Third Revised Straw Proposal provides a discussion about the topics that the CAISO currently anticipates will be within the scope of a third phase of the ESDER initiative. The CAISO requests stakeholder input on additional topics that could be included in the scope for ESDER phase 3.

### Comments:

Through the ESDER initiative, the CAISO and stakeholders developed and received FERC approval for the Metering Generator Output Methodology, or MGOM,<sup>1</sup> which enables BTM Storage resources to be measured and settled separately from native customer load under the Proxy Demand Resource model. For these resources, a Type 1 baseline would still be utilized. In ESDER Phase 3, eMotorWerks submits that a corollary metering option for PDR should be developed for DERs with a primary use of energy consumption rather than discharge (or bidirectional uses).<sup>2</sup> The prime example is unidirectional electric vehicle service equipment (EVSE), which already can provide demand response within PDR, but do so from behind the utility meter comprised typically of multiple sources of consumptions. Conceptually, this would be a meter generator input or submetered consumption methodology. The benefits of developing such a metering option include: 1) an option for PDR market participation for host customers without adequate interval metering, 2) better aligned with providing Regulation from the PDR model if developed under this ESDER initiative and 3) a viable alternative for EV/EVSEs to provide higher value services if the NGR model proves infeasible for EV/EVSEs market participation. Alternatively, CAISO could enhance the current MGOM BPM to allow for charging or consumption to be included in the baseline calculation, generally or under certain circumstances (which could be necessary in preparation for bidirectional electric vehicle batteries).

eMotorWerks appreciates the opportunity to submit these comments and to work with the CAISO staff and stakeholder on ESDER Phase 2 and Phase 3.

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<sup>1</sup> 156 FERC ¶ 61,110 Docket No. ER16-1735-000

<sup>2</sup> MGOM is limited to non-charging and non-exported metered amounts, as explained in the CAISO Demand Response User Guide. <https://www.aiso.com/Documents/DemandResponseUserGuide.pdf>. Pg 168, and the CAISO BPM for Metering April 1, 2017. [https://bpmcm.aiso.com/BPM%20Document%20Library/Metering/BPM%20for%20Metering\\_v16\\_Clean.docx](https://bpmcm.aiso.com/BPM%20Document%20Library/Metering/BPM%20for%20Metering_v16_Clean.docx), pg 66-67.