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ITC Grid Development, LLC (“ITC”) appreciates the opportunity to provide these brief comments on the CAISO’s 6/28 Excess Behind the Meter (BTM) Production issue paper.

As an initial matter, ITC agrees with and wholeheartedly supports the CAISO’s proposal to clarify the Tariff definition of Gross Load to specify that excess BTM production shall NOT be netted from Gross Load. We agree with the CAISO that the transmission system provides reliability support and capacity-related services to all customers that have access to and use the transmission system, including those customers making use of on-site distributed generation resources. All loads that remain connected to the grid are receiving service, whether that service entails back-up of the load when on-site or distributed generation is unavailable, or more continuous delivery of energy and capacity. Netting excess BTM production from Gross Load could result in free ridership by some of those connected loads at the expense of others, which should be avoided.

ITC also supports the proposal to standardize the reporting of excess BTM production across Utility Distribution Companies (UDCs). With the implications for transmission and market settlements, as well as forecasting, consistency in reporting is critical – especially as the amount of energy produced from distributed energy resources grows. Although ITC does not yet have concrete suggestions on whether the CAISO should require excess BTM production to be accounted for as generation or as negative load in the CAISO’s markets, we look forward to reviewing the comments and suggestions of other stakeholders, and to more dialogue on these issues when the CAISO issues a straw proposal.

Thank you for considering these comments. Please feel free to contact me with any questions, or to discuss in more detail.