



Stakeholder Comments Template

Excess Behind the Meter Production: Draft Final Proposal

This template has been created for submission of stakeholder comments on the **Excess Behind the Meter Production: Draft Final Proposal** that was published on **December 12, 2019**. The presentation and all related information for this initiative may be found on the initiative webpage at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/ExcessBehindTheMeterProduction.aspx>.

Submitted by	Organization	Date Submitted
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Upon completion, please submit this template to initiativecomments@caiso.com by end of day **January 16, 2019**.

Please provide your organization's comments on the following issues and questions:

1) **Gross Load tariff definition clarification**

Please state your organization's position on the **Gross Load tariff definition clarification** as described within the **Draft Final Proposal**: (Support / Support with Caveat / Oppose)

NCPA supports the clarification to the Gross Load definition including the language maintaining historic agreements as referenced in the draft final proposal definition and that the clarification continues to be just and reasonable.

If you replied supports with caveats or opposes, please further explain your position and include examples:

2) **Excess Behind the Meter Production tariff definition**

Please state your organization's position on the **Excess Behind the Meter Production tariff definition**, as described in the **Draft Final Proposal**: (Support / Support with Caveat / Oppose)

NCPA supports the proposed definition as part of the total package here advanced and references in footnote 4 honoring preexisting metering arrangements and that the definition is just and reasonable. NCPA also supports item 1 of the Changes and Feedback from the Revised Straw section proposal.

If you replied supports with caveats or opposes, please further explain your position and include examples:

3) Excess behind-the-meter production reporting and settlements

Please state your organization's position on the **Excess Behind the Meter Production reporting and settlements**, including the proposal to update the current **Unaccounted-for-Energy (UFE) determination**, as described in the **Draft Final Proposal**: (Support / Support with Caveat / Oppose)

No comments at this time.

If you support with caveat or oppose, please further explain your position and include examples:

4) Unaccounted-for-Energy (UFE) determination

Please state your organization's position on the **Excess Behind the Meter Production determination for UFE**, as described in the **Draft Final Proposal**: (Support / Support with Caveat / Oppose)

No comments at this time.

If you support with caveat or oppose, please further explain your position and include examples:

5) Application of losses

Please state your organization's position on the **Excess Behind the Meter Production application of losses**, as described in the **Draft Final Proposal**: (Support / Support with Caveat / Oppose)

No comments at this time.

If you support with caveat or oppose, please further explain your position and include examples:

Additional comments

Please offer any other feedback your organization would like to provide on the **Excess Behind the Meter Production: Draft Final Proposal**.

NCPA appreciates the opportunity to comment on this proposal.