



## Stakeholder Comments Template

### Energy Storage and Distributed Energy Resources (ESDER) Phase 4

This template has been created for submission of stakeholder comments on the Issue Paper for ESDER Phase 4 that was published on Feb 6, 2019. The paper, stakeholder meeting presentation, and all information related to this initiative is located on the [initiative webpage](#).

Upon completion of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com). Submissions are requested by close of business **Feb 27, 2019**.

Submitted by	Organization	Date Submitted
Brian Kooiman 415-737-5664	OhmConnect, Inc.	February 27, 2019

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

#### 1. Non-Generator Resource (NGR) model

Please state your organization's position as described in the Issue Paper: (Support / Support with Caveats / Oppose)

OhmConnect has no comment at this time.

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

#### 2. Bidding requirements for energy storage resources

Please state your organization's position as described in the Issue Paper: (Support / Support with Caveats / Oppose)

OhmConnect has no comment at this time.

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

### 3. Demand Response resources

Please state your organization's position as described in the Issue Paper: (Support / Support with Caveats / Oppose)

OhmConnect *supports* the Issue Paper's proposal to consider methods DRPs might utilize to reflect to the market their resources' operational characteristics and to discuss the options available to operationalize and accommodate weather-sensitive DR. However, OhmConnect believes ESDER Phase 4 should also continue discussion of certain issues raised in ESDER Phase 3, including:

- a. Offering alternate (e.g. hourly and 15-minute) bidding options;
- b. Expanding the load shift product to all PDRs; and,
- c. Supporting flexible commitment costs.

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

OhmConnect agrees with the CAISO's proposal to further explore how a PDR can most effectively model its operational limitations in the CAISO market. OhmConnect concurs with the CAISO analysis that DR resources with PMin = 0 MW are frequently committed via the RUC process, which in turn results in DR resources moving between PMin and PMax for intervals as short as five minutes. These dispatches are challenging for certain DR resources, which may be better suited to provide a sustained response. Therefore, this issue is worth consideration in ESDER 4.

OhmConnect is also supportive of exploring how to better accommodate weather-sensitive DR. Certain DR resources may not be able to fully provide their RA capacity if specific weather conditions do not materialize, and OhmConnect believes it would be beneficial for the CAISO to be able to accurately reflect this behavior with the resource retaining its RA capacity.

In addition, OhmConnect requests that in ESDER 4 the CAISO address whether PDR resources providing Local RA are eligible to utilize the hourly and 15-minute bidding options for PDRs that were designed in ESDER 3. In comments made on the Draft Final Proposal of ESDER 3, OhmConnect expressed concern that the 20-minute response time requirement for local resources would functionally prevent PDRs from utilizing the 15-minute bidding requirements.<sup>1</sup> OhmConnect understands that this issue is being considered under the umbrella of "slow DR" in the Resource Adequacy Enhancements initiative,<sup>2</sup> but suggests that, at a minimum, the CAISO confirm with the ESDER stakeholders whether the present envisioned implementation of the ESDER 3 Final Proposal will permit PDRs providing Local RA to use the alternative bidding options, and to keep the ESDER 4 stakeholders updated on the progress in the Resource Adequacy Enhancements initiative on this topic.

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<sup>1</sup> See July 27, 2018 *OhmConnect Comments on the Draft Final Proposal of ESDER 3*, at pp. 1-2, available at <http://www.caiso.com/Documents/OhmConnectComments-EnergyStorage-DistributedEnergyResourcesPhase3-DraftFinalProposal.pdf>.

<sup>2</sup> See December 20, 2018 *Resource Adequacy Enhancements Straw Proposal – Part 1*, at pp. 22-25, available at <http://www.caiso.com/Documents/StrawProposalPart1-ResourceAdequacyEnhancements.pdf>.

Furthermore, OhmConnect proposes that, in ESDER 4, the CAISO and stakeholders explore how to expand the load shift product to all technologies, and not just BTM storage. Our proposal echoes our position that there is a plethora of residential customers who might be able to effectively participate. We also note that the CPUC Working Group on Load Shift recently filed a final report that proposes, among other product proposals, a “Load Shift Resource 2.0” that would build on the PDR-LSR product with additional enhancements, including an application to all technology types.<sup>3</sup> For this reason, we posit that it may be appropriate to begin considering how the recommendations of the Working Group might fit into the current CAISO product.

Finally, OhmConnect reiterates both our earlier comments on the ESDER Phase 3 Issue Paper<sup>4</sup> and the Commitment Costs and Default Energy Bid Enhancements Straw Proposal<sup>5</sup> that we recommend the ESDER initiative consider how to incorporate flexible commitment costs for PDRs. We believe that this flexibility will allow feasible participation in the Real-Time Market – in particular, for PDRs with behavioral (as opposed to fully automated) response capabilities.

#### 4. Multiple-Use Applications (MUA)

Please state your organization’s position as described in the Issue Paper: **(Support / Support with Caveats / Oppose)**

OhmConnect has no comment at this time.

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

#### 5. Additional comments

Please offer any other feedback your organization would like to provide on the Draft Final Proposal

OhmConnect has no comment at this time.

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<sup>3</sup> See January 31, 2019 *Final Report of the California Public Utilities Commission’s Working Group on Load Shift*, pp. 7-8, available at [https://gridworks.org/wp-content/uploads/2019/01/LoadShiftWorkingGroup\\_report\\_final.pdf](https://gridworks.org/wp-content/uploads/2019/01/LoadShiftWorkingGroup_report_final.pdf).

<sup>4</sup> See October 18, 2017 *Comments of OhmConnect, Inc. – Energy Storage and Distributed Energy Resources (ESDER) Phase 3 Issue Paper*, at p. 2, available at <http://www.caiso.com/Documents/OhmConnectComments-EnergyStorageandDistributedEnergyResourcesPhase3-IssuePaper.pdf>.

<sup>5</sup> See July 20, 2017 *Comments of OhmConnect, Inc. – Commitment Costs and Default Energy Bid Enhancements Straw Proposal*, available at [http://www.caiso.com/Documents/OhmConnectComments\\_CommitmentCosts\\_DefaultEnergyBidEnhancementsStrawProposal.pdf](http://www.caiso.com/Documents/OhmConnectComments_CommitmentCosts_DefaultEnergyBidEnhancementsStrawProposal.pdf).