

Stakeholder Comments Template

Energy Storage and Distributed Energy Resources (“ESDER”) Stakeholder Initiative

Submitted by	Company	Date Submitted
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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 Objections	
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	Does not support the current MGO proposal No objections to the Type II base-line enhancements	Please see the following for SCE’s concerns and counter proposal to the MGO proposals: https://www.caiso.com/Documents/SCERComments-EnergyStorageDistributedEnergyResourcesDraftFinalProposal.pdf
Proposed clarifications to rules for non-resource adequacy multiple-use applications (provision of retail, distribution and wholesale services by the same resource)	Does not support the current proposal	See below

Proposed clarifications to rules for non-resource adequacy multiple-use applications (Distribution and Customer End Use resources participating in the ISO market)

SCE has stated in past working group meetings and comments that it is unsure if the CAISO has jurisdictional authority to directly meter and control non-WDAT resources that are located on the distribution system or connected through end-use customers¹. CAISO has agreed this is an issue and has consistently stated that this issue needs to be resolved by Local Regulatory Authorities. SCE believes these jurisdictional issues need to be resolved before rules surrounding dual use applications in CAISO space are implemented. Without developing these rules, there are no safeguards against resources receiving double payments for the same service and participating in multiple programs that count their same capabilities two or more times (for example, a behind the meter resource should not be eligible for both net energy metering and CAISO market participation and rules must be developed to ensure such double provision of the same service do not occur). SCE believes these issues need to be resolved as soon as possible and before any rules are put in place for non-WDAT multi-use applications. It is unreasonable to create market participation rules knowing that there is the possibility for double payments and double counting of resource capabilities.

¹ <https://www.aiso.com/Documents/SCEComments-EnergyStorageDistributedEnergyResources-IssuePaperStrawProposal.pdf>