



## Stakeholder Comments Template

### Excess Behind the Meter Production: Straw Proposal

This template has been created for submission of stakeholder comments on the **Excess Behind the Meter Production: Straw Proposal** that was published on **September 11, 2019**. The **Excess Behind the Meter Production**, Stakeholder Meeting presentation, and other information related to 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 of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com).

Submissions are requested by close of business on **September 26, 2019**.

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

#### Gross Load tariff definition clarification

Please state your organization’s position on the reporting of Gross Load tariff definition clarification as described in the Excess Behind the Meter Production: Straw Proposal:

SDG&E finds the following part of the CAISO’s proposed “Gross Load” tariff definition to be confusing:

“Gross Load includes Load served by Excess Behind the Meter Production.”

In using the term “includes,” the CAISO’s proposed clarification implies that an end-use customer’s Excess Behind the Meter Production actually serves that end-use customer’s Load. This is obviously not what the CAISO intends the definition to convey.

SDG&E suggests the above statement be replaced with the following:

“Gross Load is the amount of Energy withdrawn by an End-Use Customer at its connection to the distribution or transmission grid, to serve the End-Use Customer’s onsite Demand.”

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

See above.

### **Excess Behind The Meter Production tariff definition clarification**

Please state your organization's position on the Excess Behind the Meter Production tariff definition clarification as described in the Excess Behind the Meter Production: Straw Proposal:

While SDG&E agrees with the CAISO's proposed definition of "Excess Behind The Meter Production" ("Energy from an End-Use Customer in excess of its onsite Demand."), SDG&E suggests a slightly more refined definition to provide consistency with the definition for Gross Load:

"Excess Behind the Meter Production is the amount of Energy injected by an End-Use Customer at the End-Use Customer's connection to the distribution or transmission grid (adjusted for distribution losses)."

SDG&E understands that the CAISO may determine that the adjustment for distribution losses is so small that it can be ignored as a practical matter.

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

See above.

### **Excess Behind The Meter Production reporting and settlements**

Please state your organization's position on the Excess Behind The Meter Production reporting and settlements as described in the Excess Behind the Meter Production: Straw Proposal:

Support

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

N/A

### **Additional comments**

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

SDG&E is concerned with the timing for implementing any changes, if the recommendations are approved by FERC. SDG&E recommends that CAISO establish a grace period of one year between the effective date of the Tariff changes and the date of enforcement to allow LSE's time to make the necessary changes to their systems. This reasonable grace period will enable SDG&E to continue to support the Straw Proposal.