

Stakeholder Comments Template

Metering Rules Enhancements (“MRE”) Stakeholder Initiative

Submitted by	Company	Date Submitted
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San Diego Gas & Electric (SDG&E) respectfully submits the following comments in response to the California Independent System Operator (CAISO) request for stakeholder input on its the Metering Rules Enhancements (MRE) stakeholder initiative Draft Final Proposal Second Supplement.

SDG&E supports with qualifications the CAISO’s MRE proposal. The proposal of moving all generators to submitting settlement quality meter data (SQMD) in intervals of five (5) minutes is not reasonable. Improving market signals to generators through greater 5 minute granularity has little or no benefit for generators that will not or cannot respond (i.e. qualifying facilities (QFs)). Moving to 5 minute SQMD can be difficult because of both costs and relationships with the generator. The benefits to SDG&E’s customers must be greater than the total costs to justify moving to 5 minute SQMD.

The CAISO must maintain a permanent exception from moving to 5 minute SQMD for generators either unable to respond to the improved price signals or the benefits do not exceed the cost. SDG&E expects the impacts for the proposed exception to be insignificant for the CAISO market.