



Stakeholder Comments Template

Hybrid Resources

This template has been created for submission of stakeholder comments on the Hybrid Resources Issue Paper that was published on July 18, 2018. The paper, 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/HybridResources.aspx>

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **August 13, 2019**.

Submitted by	Organization	Date Submitted
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San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to comment on the California Independent System Operator's (CAISO) Hybrid Resources Initiative issue paper. SDG&E offers the following comments.

SDG&E supports the CAISO evaluating issues related to Hybrid Resources because they are becoming more prominent in CAISO's interconnection queue. The main concern for SDG&E is making sure that all the market rules are appropriate for hybrid resources.

Additionally SDG&E is concerned about whether this initiative will address issues related to currently active hybrid projects in the CAISO Queue and the variations with the interconnections of these projects, as these resources are coming in as either DC coupled or AC coupled. For DC coupled resources, SDG&E does not believe that there is concern, since these resources cannot charge from the grid. However, for AC coupled energy storage projects, some interconnection customers (ICs) are choosing not to charge from the grid and only charge from their hybrid resource as part of the system studies. With this in mind, the PTO would not be required to perform a charging study as the IC would not be charging from the CAISO controlled grid. Would it be within this initiative to have the IC provide proof that they will not be capable of charging from the CAISO controlled grid to maintain compliance with any interconnection agreements as this could be a reliability concern if they were to charge from the system? For those ICs that determine they would like to change their interconnection agreement to include

charging from the CAISO controlled grid, would require a Material Modification Assessment (MMA).