

July 25, 2018

**COMMENTS OF THE CITIES OF ANAHEIM, AZUSA, BANNING, COLTON,
PASADENA, AND RIVERSIDE, CALIFORNIA ON THE
EXCESS BTM PRODUCTION ISSUE PAPER**

In response to the ISO's request, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the "Six Cities") provide their comments on the June 28, 2018 Excess BTM Production Issue Paper ("Issue Paper") and the related stakeholder web conference held on July 10, 2018:

The Six Cities understand the ISO's concerns with respect to maximizing accuracy and consistency of data reporting for excess behind the meter ("BTM") energy production. The Issue Paper, however, does not discuss the potential impacts of limitations on data availability on achieving the levels of accuracy and consistency desired by the ISO. None of the Six Cities currently requires metering arrangements for BTM resources that would enable identification of excess BTM production on a granular basis. In Riverside, for example, excess BTM production over the course of a month can only be discerned from monthly meter data, and it is "netted" from load by default, rather than by design. The Issue Paper does not acknowledge the challenges that may result from data availability limitations much less explain how the impact of such limitations might be resolved.

Any proposed rule for consistent reporting of excess BTM production data must take into account the realities of data availability. UDCs cannot report data that they have no means of collecting. Where metering arrangements do not allow granular identification of excess BTM production, it may be possible to develop profiles for conversion of aggregate data or to estimate UDC-wide excess BTM production based on sampling techniques. The ISO should work with any UDCs that do not have granular data available on excess BTM production to develop such alternative approaches and, to the extent necessary, allow a transition period to enable development and testing of such techniques.

The Six Cities could support going-forward requirements for metering that would identify excess BTM production for new BTM resources, subject to a reasonable advance notice period and implementation of a waiver or exemption process where necessary metering equipment is not available at reasonable cost. But it would not be reasonable to impose requirements for extensive retrofitting of metering arrangements for existing BTM resources, and existing BTM resources (and their UDCs) should receive a grandfathered exemption from any requirements to produce resource-specific granular data. Furthermore, any reporting rules developed as part of this initiative should be consistent with state-mandated requirements applicable to Net Energy Metering ("NEM") programs.

In crafting the Straw Proposal for this initiative, the ISO should be mindful of potential data limitations and develop reporting rules that will accommodate variations or alternatives as necessary to allow for constructive use of available data. The Six Cities would be happy to

discuss data availability concerns and potential work-arounds with the ISO Staff. Alternatively, if other stakeholders also identify concerns with data availability, this may be a useful topic for a workshop prior to completion of the Straw Proposal.

Submitted by,

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