



Stakeholder Comments Template

Excess Behind the Meter Production: Draft Final Proposal

This template has been created for submission of stakeholder comments on the **Excess Behind the Meter Production: Draft Final Proposal** that was published on **December 12, 2019**. The presentation and all related information for 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, please submit this template to initiativecomments@caiso.com by end of day **January 16, 2019**.

Please provide your organization's comments on the following issues and questions:

1) **Gross Load tariff definition clarification**

Please state your organization's position on the **Gross Load tariff definition clarification** as described within the **Draft Final Proposal**: (Support / Support with Caveat / Oppose)

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

No comment.

2) **Excess Behind the Meter Production tariff definition**

Please state your organization's position on the **Excess Behind the Meter Production tariff definition**, as described in the **Draft Final Proposal**: (Support / Support with Caveat / Oppose)

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

No comment.

3) Excess behind-the-meter production reporting and settlements

Please state your organization's position on the **Excess Behind the Meter Production reporting and settlements**, including the proposal to update the current **Unaccounted-for-Energy (UFE) determination**, as described in the **Draft Final Proposal**: (Support / Support with Caveat / Oppose)

If you support with caveat or oppose, please further explain your position and include examples:

No comment.

4) Unaccounted-for-Energy (UFE) determination

Please state your organization's position on the **Excess Behind the Meter Production determination for UFE**, as described in the **Draft Final Proposal**: (Support / Support with Caveat / Oppose)

If you support with caveat or oppose, please further explain your position and include examples:

No comment.

5) Application of losses

Please state your organization's position on the **Excess Behind the Meter Production application of losses**, as described in the **Draft Final Proposal**: (Support / Support with Caveat / Oppose)

If you support with caveat or oppose, please further explain your position and include examples:

No comment.

Additional comments

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

In the Revised Straw Proposal issued on November 5, 2018, the CAISO committed to publishing an aggregation of the excess behind the meter production data in response to stakeholder requests. Specifically, on page 6 of the Revised Straw Proposal, the CAISO stated:

“The ISO is committed to publishing an aggregation of the excess behind the meter production data in a monthly performance report that will be posted every other month.”

It is WPTF’s understanding that this was inadvertently left out of the CAISO’s Draft Final Proposal. Thus, WPTF is requesting the CAISO issue a redlined version of the Draft Final Proposal to reflect this commitment.

Additionally, WPTF would like to take this opportunity to reiterate its previous ask that the published data be reported by load aggregation point and as temporally granular as feasible (i.e. 5-minute data preferred if available). Having the data reported in such a way to allow participants to align the production data with energy market prices would be extremely beneficial from a market transparency perspective.