



COMMENTS OF ADVANCED MICROGRID SOLUTIONS

Energy Storage and Distributed Energy Resources (“ESDER”) Stakeholder Initiative Revised Draft Final Proposal posted on 12/23/15 and as supplemented by the presentation materials and discussion during the stakeholder web conference held on 01/07/16

Submitted by	Company	Date Submitted
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Advanced Microgrid Solutions (AMS) offers these comments on the California Independent System Operator (CAISO) Energy Storage and Distributed Energy Resources (ESDER) Initiative’s Revised Draft Final Proposal. Throughout the course of the development of the Proposal, the CAISO staff has demonstrated a strong willingness to work with all stakeholders on viable solutions, specifically as they relate to performance measures for the proxy demand resource (“PDR”) product. AMS greatly appreciates the CAISO’s commitment to advancing the markets while keeping the field level for all participants.

Please see below chart for an overview of AMS’s position on various topics in the proposal.

Proposal	Overall Level of Support (Fully Support; Support With Qualification; or, Oppose)	Comments (Explain position)
Allow an NGR resource to provide its initial state of charge (SOC) as a bid parameter in the day-ahead market.	Fully Support	
Allow an NGR resource the option to not provide energy limits or have the ISO co-optimize an NGR based on the SOC.	Fully Support	



<p>Allow a PDR/RDRR resource the option of a performance evaluation methodology based on Metering Generator Output (“MGO”) concepts.</p>	<p>As proposed.</p>	<p>Oppose</p>	<p>Given the novelty of the role of storage resources for grid-level operations and the inherent complexity in determining a baseline methodology that is both accurate and consistent with established market principles, AMS respectfully requests that the CAISO not move forward with the alternative baseline methodology documented in the Proposal. It is the view of AMS that the current CAISO proposal goes as far as it can, in part with the constraints of the current PDR construct and the timing of ESDER Phase I, but not far enough. When we look holistically at the solution, we are concerned about setting a precedent that inadequately values the services that storage resources can provide.</p>
	<p>With modification proposed by SCE.</p>	<p>Support with Qualification</p>	<p>AMS appreciates SCE’s willingness to engage constructively on this issue. While we still have reservations on the broader question of adequately valuing behind-the-meter (BTM) resources, we are comfortable supporting the SCE proposal. We still hope to continue these discussions, and ideally find a better solution for measuring BTM resources, in Phase II of ESDER.</p>
<p>Proposal to support use of statistical sampling</p>		<p>Fully Support</p>	