



Stakeholder Comments Template

Energy Storage and Distributed Energy Resources Phase 3

This template has been created for submission of stakeholder comments on the Draft Final Proposal of ESDER 3 that was published on July 11, 2018. The Draft Final Proposal, Stakeholder Meeting presentation, and other information related to this initiative may be found on the initiative webpage at: [ESDER Webpage](#)

Upon completion of this template, please submit it to initiativecomments@caiso.com.

Submissions are requested by close of business on **July 27, 2018**.

Submitted by	Organization	Date Submitted
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Please provide your organization's comments on the following issues and questions.

1. Bidding and real-time dispatch options for Demand Response

The California Large Energy Consumers Association (CLECA) supports the new bidding and real-time dispatch options for Demand Response (DR), including in particular the one-hour block bidding and 15-minute dispatchable resource option. CLECA appreciates the additional feature that Proxy Demand Resources (PDR) with an hourly block bid will have the option to be cleared in the day-ahead market but not be considered in Residual Unit Commitment. CLECA still believes that a maximum run time parameter is needed for Reliability Demand Response Resources and PDR and encourages the CAISO to consider adding this parameter in an ESDER stakeholder process in 2019.

2. Removal of the single load serving entity aggregation requirement and the application of a default load adjustment

CLECA supports the removal of the single load-serving entity (LSE) requirement and default load adjustment, as well as the clarification that SIBR will only accept bids at or above the net benefits test (NBT) threshold.

3. Load shift product for behind the meter storage

CLECA takes no position on this proposal, as it applies only to storage.

4. Measurement of behind the meter electric vehicle supply equipment (EVSE) load curtailment

CLECA takes no position on this proposal.

5. Additional comments

CLECA would support an ESDER 4 process for next year to address the following DR-related issues in the CAISO market that were discussed but not addressed in ESDER3:

- a) The development of a maximum run time so that DR resources do not have to put in outage cards when their maximum run times are reached.
- b) A solution to the minimum run time issue by building it into the market model as beginning when the curtailment starts, unless the CAISO determines that this issue can be resolved by a Business Practice Manual change. This issue was discussed in the CPUC's Supply Side Working Group meeting on June 20, 2018.
- c) The development of a resource ID that can apply to multiple resources that can be used in sequence and dispatched as a single resource (e.g. DR plus storage).
- d) The treatment of the must-offer obligation for weather-sensitive DR and the possible use of the variable energy resource (VER) model for such DR.