

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your written comments on the ESDER Phase 3 Revised Straw Proposal.



California ISO

Submit comments to InitiativeComments@CAISO.com

Comments are due July 6, 2018 by 5:00pm Pacific Time

The CAISO requests your comments to the ESDER 3 proposal:

1. New bidding and real-time dispatch options for demand response (DR)

Comments:

The California Large Energy Consumers Association (CLECA) supports the CAISO's proposed new bidding and real-time dispatch options for demand response (DR) based on its intertie model. This change accommodates DR resources that need to put in a block schedule for an hour and would provide notice of an award of 52.5 minutes. Because the resources would receive market awards based on the T-52.5 hour-ahead scheduling process (HASP) price but would be settled under the 15-minute market LMP for each 15-minute period, we have some concern that this requires the resource to be

a price taker for the entire hour and thus to take on pricing risk. However, it will be up to the DR providers to determine how this affects them. Longer term, because with DR there is no need for transmission scheduling, the HASP process is not necessary. Therefore, the CAISO should investigate if the hourly block can be awarded in the 15-minute market at T-22.5 minutes with the first 15-minute block having price certainty. The CAISO has also proposed to allow a 15-minute bidding option, rather than the current 5-minute option in the real-time market, which will be beneficial for DR that can change output on a 15-minute basis.

2. Removal of the single load serving entity (LSE) aggregation requirement and the need for application of a default load adjustment (DLA)

Comments:

The removal of the single load-serving entity (LSE) requirement for a DR resource will make it easier for existing resources to meet the 100 kW minimum requirement for proxy DR while resources still represent separate subLAPs and DR providers. With load migration among LSEs, this will reduce the risk of stranded resources. CLECA supports this change and the elimination of the need to use a default load adjustment.

3. PDR-Load Shift Resource

Comments:

[Insert comments here]

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

Comments:

[Insert comments here]

5. Other comments

Please provide any additional comments not associated with the topics above.

Comments:

CLECA would support an ESDER 4 process for next year to address several remaining DR-related issues in the CAISO market. One such issue would be 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. Another would be 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 BPM change. This issue was discussed in the CPUC's Supply Side Working Group meeting on June 20, 2018. Another would be 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). Yet another would be 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. These are all issues that have been raised but not addressed in ESDER 3.

Additionally, we suggest exploring the issue of whether it is feasible to establish an hourly block DR award with the first 15-minute interval having price certainty.