

Comments of the California Large Energy Consumers Association  
On the Proposed Scope and Schedule for  
The Energy Storage and Aggregated Distributed Energy Resources  
Participation Stakeholder Initiative  
May 29, 2015

The California Large Energy Consumers Association (CLECA) provides these brief comments on the proposed scope and schedule for the Energy Storage (Storage) and Aggregated Distributed Energy Resources (ADER) Participation Stakeholder Initiative (Initiative).

CLECA appreciates the proposal to include in the Initiative in 2015 the evaluation of additional baselines for PDR and RDRR that meet the NAESB standards. If baseline changes require tariff changes, we would hope that their approval could occur at some time in 2016. However, given that needed software changes for DR settlement are not expected until later in 2016, the new baselines may not be able to be implemented until 2017. For this reason, starting on this issue sooner rather than later is wise.

CLECA does have two significant concerns about the proposed initiative, however.

1. The proposal is to address all other PDR and RDRR-related matters in 2016 and beyond. According to slide 16, this includes exploring the dispatch of DR to increase consumption and open policy issues from CPUC demand response working groups. The possibility that such matters might be addressed in 2016 would suggest that any resolution would not affect PDR and RDRR resources until 2017 at the earliest. If some of these open policy issues are not resolved until “beyond” 2016, i.e. 2017, they may not be resolved until 2018 or later. The resolution of these issues will have a bearing on the ability of demand response providers (DRPs), whether utilities or aggregators, to integrate PDR and RDRR into the CAISO’s markets. Thus, the timing of addressing and resolving the issues is likely to have a direct impact on the ability to implement the CPUC’s bifurcation policy direction, which is that all DR that can be integrated into the CAISO’s markets should be integrated by 2018. For this reason, we would urge resolution and implementation as soon as possible.

2. The heavy emphasis on storage issues suggests that there will be time limitations in addressing DR-related matters, which, according to the May 21 telephone meeting, will be addressed in conjunction with storage-related matters. This proposal to address the two together will also mean that participants who are not interested in both DR and storage will not be able to use their time as efficiently as if the two topics were considered in parallel or at least in separate meetings or calls. While we understand that the CAISO is concerned about avoiding “silos”, the reality is that NGR, PDR, and RDRR are not the same products, so divergence already exists. We would urge the CAISO to at least attempt to set up agendas where participants only interested in one of the topics could only join in a part of the presentations and discussions in order to best manage their time.