



Stakeholder Comments Template

Excess Behind the Meter Production: Straw Proposal

This template has been created for submission of stakeholder comments on the **Excess Behind the Meter Production: Straw Proposal** that was published on **September 11, 2019**. The **Excess Behind the Meter Production**, Stakeholder Meeting presentation, and other information related to this initiative may be found on the initiative webpage at: <http://www.caiso.com/informed/Pages/StakeholderProcesses/ExcessBehindTheMeterProduction.aspx>

Submitted by	Organization	Date Submitted
<i>Glen Perez</i>	<i>Independent Contractor</i>	<i>(09/26/2018)</i>

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

Submissions are requested by close of business on **September 26, 2019**.

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

Gross Load tariff definition clarification

Please state your organization's position on the **reporting of Gross Load tariff definition clarification** as described in the **Excess Behind the Meter Production: Straw Proposal**: (Support, support with caveats or oppose)

I support the proposed definition.

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

Excess Behind The Meter Production tariff definition clarification

Please state your organization's position on the **Excess Behind the Meter Production tariff definition clarification** as described in the **Excess Behind the Meter Production: Straw Proposal**: (Support, support with caveats or oppose)

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

I support the proposed definition.

Excess Behind The Meter Production reporting and settlements

Please state your organization's position on the **Excess Behind The Meter Production reporting and settlements** as described in the **Excess Behind the Meter Production: Straw Proposal**: (Support, support with caveats or oppose)

I support, with caveats, the reporting and settlement concepts outlined in the straw proposal.

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

Caveats:

- *To better understand the settlement impact of this change, I suggest the ISO provide illustrative examples of a typical settlement. This could be for one interval for all the impacted charge codes (as shown on Appendix A of the Straw Proposal). The minimum suggested scenarios, with load and rooftop solar, could be:

 - *Metered load reported (ignoring excess roof top solar production)*
 - *Netted load reported (Metered load, from previous example, minus the rooftop solar output)*
 - *Proposed solution, Metered load reported and metered Excess Behind the Meter Production (EBMP) reported**

These scenarios will show the difference for both situations, with entities that are reporting the metered load only or those that may have been netting their load submittals, from entities present settlement and the future settlement with the EBMP submitted as proposed.

Additional comments

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

- *Suggest that Tariff Section 10.3.6.2 , Timing of SQMD Submission for Calculation of Recalculation Settlement Statement T+12B (and possibly similar reference in the settlement tariff section) be reviewed for possible revision to item (b) which explains the ISO's handling of settlement when actual or estimated SQMD is not available at T+8B. Because the EBMP will not have a schedule there would be no*

method for the ISO to estimate a value, other than zero. The ISO should consider the tariff needs to state that no estimation be the ISO will be made for EBMP.

- *The ISO should determine if there needs to be any unique VEE rules described in the Metering BPM for EBMP.*
- *The ISO should review Tariff Section 10.3.2.1, Duty to Provide Settlement Quality Meter Data, to determine if there is a need for clarification or revision to this section where it states in part: "...shall be accurate measure of actual production or consumption for Energy..." Actual production and actual consumption are not defined terms.*
- *The changes to the Gross Load definition seems to be well thought out and created to be very clear. The straw proposal states..."This allows the removal of additional language that is both superfluous and confusing." Hopefully, in future tariff changes, the ISO seizes the opportunity and time to clarify other definitions and sections to remove other superfluous and confusing items.*