

## Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the ESDER Phase 2 stakeholder initiative Straw Proposal posted on May 24 and as supplemented by the presentation and discussion during the stakeholder web conference held on May 31.

Submit comments to [InitiativeComments@CAISO.com](mailto:InitiativeComments@CAISO.com)

**Comments are due June 9, 2016 by 5:00pm**

The Straw Proposal posted on May 24 and the presentation discussed during the May 31 stakeholder web conference may be found on the [ESDER Phase 2](#) webpage.

Please provide your comments on the Straw Proposal topics listed below and any additional comments you wish to provide using this template.

### **NGR enhancements**

The CAISO is proposing to explore two areas of possible NGR enhancement: (1) represent use limitations in the NGR model and (2) represent dynamic ramping in the NGR model.

The CAISO is requesting stakeholders provide comments in each of these two areas.

### **Comments:**

Joint Demand Response Parties (JDRP) finds CAISO's NGR model enhancements to be reasonable, but we don't have comments on the proposal at this time.

**Demand response enhancements**

Two stakeholder-led work groups are up and running within ESDER 2 to explore two areas of potential demand response enhancement:

- Baseline Analysis Working Group – Explore additional baselines to assess the performance of PDR when application of the current approved 10-in-10 baseline methodology is sufficiently inaccurate.
- Load Consumption Working Group – Explore the ability for PDR to consume load based on an ISO dispatch, including the ability for PDR to provide regulation service.

The CAISO is requesting stakeholders provide comments in each of these two areas.

**Comments:**

JDRP supports the Straw Proposal's proposed demand response enhancements. We appreciate the working groups' recommendations that CAISO stakeholders explore the ability for PDR to have additional baseline options and to potentially provide regulation service. We look forward to participating in the stakeholder discussions.

**Multiple-use applications**

The ISO has not yet identified specific MUA issues or topics that require treatment in ESDER 2. The ISO proposes to continue its collaboration with the CPUC in this topic area through CPUC Rulemaking 15-03-011. If an issue is identified that should be addressed within ESDER 2 the ISO can amend the scope and develop a response.

The ISO is requesting stakeholders provide comments on this topic area as well as this proposed approach.

**Comments:**

JDRP does not have comments on MUA issues at this time.

**Distinction between charging energy and station power**

The ISO proposes to seek Board approval in two ways:

- To revise the ISO tariff definition of station power to exclude explicitly charging energy (and any associated efficiency losses); and

- Permit the ISO to revise its tariff later to be consistent with IOU tariffs, as needed, in the event that they revise their station power rates.

The CAISO is requesting stakeholders provide comments on this proposed approach.

**Comments:**

JDRP does not have comments on the distinction between charging energy and station power at this time.

**Other comments**

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

**Comments:**

JDRP appreciates the opportunity to provide these brief comments on the ESDER Straw Proposal. We look forward to taking a more active role as working groups move forward on these issues.