



Excess Behind the Meter Production: Straw Proposal

This template has been created for submission of stakeholder comments on the **Excess Behind the Meter Production: Revised Straw Proposal** that was published on **November 5, 2019**. The presentation and all related information for this initiative may be found on the initiative webpage at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/ExcessBehindTheMeterProduction.aspx>.

Submitted by	Organization	Date Submitted
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Upon completion, please submit this template to initiativecomments@caiso.com by end of day **November 27, 2018**.

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

1) **Gross Load tariff definition clarification**

PG&E supports CAISO's proposed Gross Load tariff definition change that clarifies that Excess BTM Production (EBTMP) should not be netted from Gross Load. PG&E also supports the removal of the initial clause stating that Gross Load is used for the purposes of calculating TAC. PG&E agrees with CAISO that all reliability-related charges should be allocated via Gross Load—as mentioned in later sections of the Revised Straw Proposal.

2) **Excess Behind the Meter Production tariff definition**

PG&E supports the CAISO's definition of Excess Behind the Meter Production but requests it be modified to include the additional language "as measured by the export channel of the End-Use Customer's meter". This definition is necessary to properly differentiate between Gross Load, which does not net EBTMP, and "Net Load", which would be Gross Load minus EBTMP.

3) **Excess behind-the-meter production reporting and settlements**

PG&E supports the CAISO's update to Excess Behind the Meter Production reporting and settlements section. PG&E believes the updated determination for Unaccounted for Energy (UFE) is appropriate given the updated tariff definition of Gross Load and EBTMP.

4) Amended charge codes allocated based on gross load

PG&E supports the CAISO's proposal to allocate the amended charge codes listed in Appendix A to Gross Load. PG&E agrees that it is reasonable for charges related to reliability to be allocated based on gross load while charges related to energy use be allocated based on Gross Load net of EBTMP (i.e. "Net Load").

5) Application of losses

PG&E believes the application of losses deserves more discussion and consideration within this initiative. PG&E agrees with the characterization that if EBTMP goes to serve load in a neighboring household within the same distribution line, there should be avoided loss *IF* that energy would have come from the transmission-connected generator otherwise. The amount of avoided loss, however, is dependent on amount of loss that occurs traveling from one point on the distribution node to another. While that assumption still mostly holds, California's distribution grid is rapidly changing, and a one-way power flow system is increasingly not the norm. For example, for locations where there is high penetration of distribution-connected generators (both in front of the meter and behind the meter), it is very possible and likely for EBTMP to flow past the T-D interface. In those instances, it is not appropriate to provide a credit for avoided losses. Instead, distribution losses occur whichever way the energy flows, so a factor should be applied to "gross down" EBTMP. The current proposal assumes that the current paradigm of a one-way power flow system will persist and that all EBTMP will continue to serve neighboring households. PG&E notes that the even in the current paradigm, EBTMP is not the appropriate measure of avoided Transmission deliveries, due to the distribution line losses as power moves from the EBTMP point to the load that it serves. PG&E recommends that CAISO continue this discussion in its stakeholder process and seeks a solution that considers the dynamics of California's changing grid.

Additional comments

PG&E supports this initiative's effort to standardize the way different scheduling coordinators report Gross Load. In that same vein, PG&E requests further clarification on the methodology scheduling coordinators use to aggregate meter readings to report their Gross Load and Excess BTM at its respective Default Load Aggregation Point (DLAP) or Custom Load Aggregation Point (CLAP).

To PG&E's understanding, it is more appropriate to sum the export and import meter channel readings within each interval first before summing across all End-Use Customer meters within its respective DLAP or CLAP. If a LSE nets End-Use Customer's meter reading across each interval first, that LSE would be under-reporting Gross Load and Excess BTM Production despite having the same "Net Load" number. The following example illustrate PG&E's understanding of how a scheduling coordinator would aggregate across multiple customers assuming meters that record on a 15-minute interval.

Meter Reading

Hour Ending	12							
Interval (15-min)	1		2		3		4	
Meter Channel	Load	Export	Load	Export	Load	Export	Load	Export
Customer 1	5	10	20	4	20	4	20	2
Customer 2	5	0	5	0	5	0	5	0
Customer 3	0	5	0	5	0	5	0	5

PG&E's Understanding: Sum channel across all intervals before summing customers

Hour Ending	12	
Channel	Load	Export
Customer 1	65	20
Customer 2	20	0
Customer 3	0	20
Sum of all Customer	85	40
Gross Load	85	
Excess BTM Production	40	
"Net Load"	45	