

Stakeholder Comments Template

| Submitted by | Company | Date Submitted |
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Please use this template to provide your comments on the Issue Paper and Straw Proposal posted on July 30, 2015 and as supplemented by the presentation and discussion during the stakeholder web conference held on August 6, 2015.

Submit comments to InitiativeComments@caiso.com

[Comments are due August 18, 2015 by 5:00pm](#)

All documents for the energy storage and distributed energy resources (ESDER) initiative, including the July 30, 2015 Issue Paper and Straw Proposal and the presentation discussed during the August 6, 2015 stakeholder web conference, are available on the webpage for the ESDER initiative at:

http://www.caiso.com/informed/Pages/StakeholderProcesses/EnergyStorage_AggregatedDistributedEnergyResources.aspx

Non-generator resources (NGR) enhancements

Please provide your comments in each of the four areas of proposed NGR enhancement.

1. Update documentation on NGR to capture material and clarifications compiled for April education forums.

Comments:

SCE does not have any comments on this topic at this time.

2. Clarify how ISO uses state of charge (SOC) in market optimization.

Comments:

SCE does not have any comments on this topic at this time.

3. Evaluate initial SOC as a submitted parameter in the day-ahead market.

Comments:

SCE does not have any comments on this topic at this time.

4. Evaluate option to not provide energy limits or have the ISO co-optimize an NGR based on state of charge.

Comments:

SCE does not have any comments on this topic at this time.

PDR/RDRR enhancements – alternative baseline methodologies

Please provide your comments in each of the two areas of proposed enhancement.

1. Develop meter generator output (MGO) as a new ISO baseline methodology.

Comments:

This type of measurement may be required for resources that do not fit into the existing baseline measurement methods. However, SCE is not sure if CAISO has the jurisdiction to meter and control customer's behind the meter resources. SCE believes the jurisdiction issue needs to be studied and resolved before the new baseline methodology is implemented.

2. Develop additional detail regarding the "ISO Type 2" baseline methodology (i.e., provision of statistically derived meter data) and document that in the appropriate BPMs.

Comments:

SCE does not have any comments on this topic at this time.

Non-resource adequacy multiple use applications

Please provide your comments on each of the two non-RA scenarios the ISO has proposed to address.

Also, the ISO strongly encourages stakeholders to **identify and describe use cases** under each scenario (including diagrams of the configurations contemplated for these use cases), and specific issues not covered in these scenarios that should be addressed in this initiative.

1. Type 1: Resource provides services to the distribution system and participates in the ISO market. Question 1 – How do we manage conflicting real-time needs or dispatches by the distribution utility and the ISO? Question 2 – If distribution system and ISO needs are aligned, and the resource’s actions meet the needs of both, is there a concern about the resource being paid twice for the same performance? Under what situations is double payment a concern? How should we address this concern? Question 3 – Should any restrictions be on a DER aggregation or the sub-resources of a DER aggregation providing distribution-level services? Would the distribution utility ever call upon a multi-pricing node DER aggregation to address a local distribution problem?

Comments:

During the conference call, SCE asked if CAISO has jurisdiction over resources connected to the distribution system if they are not WDAT resources. CAISO agreed that it is an important question that needs to be resolved. At this time, SCE does not have an opinion on the answer to this question, but believes it needs to be resolved before any of the rules around the dual use of these resources are put into place. Additionally, if this dual use option is allowed, the relationship between state programs and ISO participation will need to be explored. Resources may need to be limited to participating through only one type of program to avoid double payments for the same services.

2. Type 2: Resource provides services to end-use customers and participates in the ISO market. The ISO has identified the following three sub-types (are there others?): (a) DER installed behind the customer meter, such that flow across the customer meter is always net load; (b) DER installed behind customer meter, such that flow across the customer meter can be net load or net injection at different time; and (c) DER installed on the utility side of the meter, may provide service to end-use customers and participate in wholesale market.

Comments:

Similar to the comments above, SCE believes jurisdictional issues need to be resolved before any dual use rules are implemented for behind the meter resources. Also the same as above, rules may need to be developed to ensure dual use resources do not receive double payments from state programs and through participation through the ISO (for example, behind the meter

resources could be eligible for both Net Energy Metering incentives and CAISO participation revenue).