



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>Bert Hansen</i>	<i>Southern California Edison</i>	<i>September 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)

SCE Comments: SCE believes the definition represents a significant improvement over the current definition, and supports the definition with caveats.

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

SCE Comments: SCE agrees that the definition should clarify that Excess BTM Production is not to be netted against End Use Customer Load in determining Gross Load. However, SCE is not convinced that the sentence in the leading paragraph "Gross Load includes Load served by Excess Behind the Meter Production" definitively clarifies the issue. SCE would prefer a more direct sentence as follows:

“Excess BTM Production is not a component of Gross Load, and shall not be netted against End-Use Customer Load in determining Gross Load”.

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)

SCE Comments: SCE supports the definition, but believes the definition should be clarified so that it is clear that it does not include any energy from a Participating Generator in excess of any retail BTM load.

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

SCE Comments: No additional comments.

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)

SCE Comments: SCE is in agreement with the proposed settlement of Excess BTM Production as negative load. However, SCE believes that distribution loss factors (“DLFs”) should be applied to the amount of Excess BTM Production in order for there to be a consistent treatment between end-use load and Excess BTM Production located at the same point on the distribution system. DLFs are appropriately applied to metered end-use load by the reporting Scheduling Coordinator in order to bring the load up to the ISO Grid Level. This DLF is applied whether or not there is any generation on the distribution circuit that the load is located on. Equivalently, for Excess BTM Production (negative load) located on the distribution system, DLFs should also be applied (again, regardless of whether there is any load on the distribution circuit the Excess BTM Production is located on). Applying DLFs both to positive load (conventional end-use load), and negative load (Excess BTM Production) will assure an equivalent treatment of the two in the ISO settlement system.

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

SCE Comments: Asymmetrical application of distribution loss factors to Load and Excess BTM Production will result in Unaccounted for Energy. Only applying distribution loss factors to the load will understate the generation that serves that load or overstate the load that is served by local Excess BTM Production as shown in the example below:

Excess Behind the Meter Production Straw Proposal - Table 2 and 3 extension

		Reported/Observed values	
		Household 1	Household 2
Load	[A]	1 kWh	5 kWh
Rooftop Solar Output	[B]	2 kWh	0 kWh
Instantaneous Meter Read Load Channel	[C]	0 kWh	5 kWh
Instantaneous Meter Read Export Channel	[D]	1 kWh	0 kWh

Table 3 extension - including application of Distribution Loss Factors on Load only or Load and Excess Generation

				Reported value using 10% DLF	
		Observed Value		Load Only	Load and Excess Gen
S Load	[E]	[A1+A2]	1 kWh + 5 kWh = 6 kWh	6.6 kWh	6.6 kWh
S Metered Load (S Load Channels)	[F]	[C1+C2]	0 kWh + 5 kWh = 5 kWh	5.5 kWh	5.5 kWh
S of Load - S of Rooftop Solar Output	[G]	[(A1+A2)-(B1+B2)]	6 kWh - 2 kWh = 4 kWh	4.4 kWh	4.4 kWh
Gross Load with "netting Excess BTM Production"	[H]	[(C1+C2)-(D1+D2)]	5 kWh - 1 kWh = 4 kWh	4.4 kWh	4.4 kWh
Gross Load with "non-netting Excess BTM Production"	[I]	[C1+C2]	0 kWh + 5 kWh = 5 kWh	5.5 kWh	5.5 kWh
Excess NEM Generation	[J]	[D1+D2]	1 kWh + 0 kWh = 1 kWh	1.0 kWh	1.1 kWh
Unaccounted For Energy (UFE)	[K]	[F-G-J]		-0.1 kWh	0.0 kWh

Excluding Excess NEM Generation from the loss factor calculation will result in underrepresentation of the generation and create unaccounted for energy. The difference between the two yellow cells will be a new contribution to UFE that comes from not applying a distribution loss to the Excess NEM generation.

Additional comments

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

SCE Comments: The Straw Proposal at footnote 5 states that the proposed treatment of Excess BTM Production “would not apply to certain entities that may have preexisting metering arrangements with the ISO, such as some smaller POU’s and certain MSS entities, for which load figures are calculated at a citygate from various inputs.”

SCE is concerned that the Straw Proposal may be identifying a disparate treatment between PTOs with respect to billing of the Transmission Access Charge to PTOs. SCE’s interpretation of the ISO Tariff is that the TAC is assessed to all PTOs on a Gross Load basis, with no netting of any internal generation from internal load.¹ If

¹ See ISO Tariff Section 26.1.2 for example “The Regional Access Charge for a billing period is calculated by the CAISO as the product of the applicable Regional Access Charge, and Gross Load connected to the facilities of the UDC and MSS Operator in the PTO Service Territory.

there is internal generation within the Service Area of a PTO, it should not be netted.² However, if some PTOs are metered at the “citygate”, how is the ISO ensuring that there is no netting of internal generation of the PTO load?

If some smaller PTOs do not have the metering infrastructure that the three IOU PTOs do, which allows accurate identification of Excess BTM Production, that should not change the basic principle that the TAC should be billed on Gross Load determined from end-use meter data for all PTOs. If, for example, it is the case that some PTOs have meters that only read total kWh during a billing cycle, with no separate “in” and “out” channels (Channel 1 and Channel 2), then there should be a separate discussion of whether it is possible to identify “Excess BTM Production” for such entities.³ However, in the meantime it should not be the case that any PTO is allowed to net internal generation from its total load for the purpose of determining Gross Load.

² SCE is aware that Wheeling customers (i.e., not PTOs) internal to the ISO Balancing Authority Area do receive disparate treatment in the sense that they are permitted to net internal generation for the purpose of determining their Wheeling Access Charge billing quantity of load.

³ If this is the case, then it may be the case that at some future point in time all PTOs will have the metering infrastructure to be able to specifically identify Excess BTM Production.