

June 5, 2019

Bill Weaver
California Independent System Operator
250 Outcropping Way
Folsom, CA 95630

RE: ESDER Phase 3 FERC Tariff Revisions

Dear Bill,

eMotorWerks respectfully submits the following comments regarding the California Independent System Operator's (CAISO) proposed revisions to the CAISO tariff to implement policies adopted in the Energy Storage and Distributed Energy Resources (ESDER) Phase 3 stakeholder initiative.

eMotorWerks is disappointed that the implementation of the direct electric vehicle supply equipment (EVSE) submetering pathway for wholesale market settlement purposes, adopted in ESDER Phase 3, will be delayed until the Fall of 2020.¹ We would ask that, in the future, CAISO staff reach out to affected stakeholders before proposing implementation delays.

CAISO's proposed tariff revisions² reflect this delay and do not include the adopted EVSE submetering pathway, instead working to implement the adopted policies slated for Fall 2019:

- Hourly and 15-minute bid / dispatch options
- Proxy Demand Resource energy schedules / awards and instructions provided by Customer Market Results Interface
- Removal of single Load Serving Entity and Default Load Adjustment / bid price criteria

By these comments, eMotorWerks seeks confirmation that CAISO plans to propose tariff revisions to effectuate the EVSE submetering pathway, as approved by the CAISO Board, by Q2 2020, for an anticipated November 2020 market release and implementation.

Sincerely,

/s/ Marc Monbouquette

Marc Monbouquette
Senior Manager, Regulatory and Government Affairs
eMotorWerks

Cc:
Jill Powers
Eric Kim
James Bishara

¹ <http://www.caiso.com/Documents/Presentation-EnergyStorage-DistributedEnergyResourcesPhases2-3-ImplementationCustomerPartnershipGroup-May6-2019.pdf>, slide 11.

² <http://www.caiso.com/Documents/DraftTariffLanguage-EnergyStorage-DistributedEnergyResourcesPhase3.docx>