

Advanced Energy Management Alliance

Presentation to NYISO BACWG/MTF Draft Meter Service Entity Manual and Registration Packet

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Advanced Energy Management Alliance

Empowering consumers through distributed energy resources, including demand response and advanced energy management.

We are providers and consumers united to overcome barriers to nationwide use of distributed energy resources. We advocate for and educate on policies that empower and compensate consumers to have cost-effective, efficient, resilient, reliable, and environmentally-sustainable choices.

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Agenda

- Previous AEMA comments
- Questions and Concerns
 - Meter Service Entity (MSE) Application Process
 - MSE Manual
- AEMA Recommendations

AEMA submitted comments on MSE materials

- AEMA previously submitted two sets of comments to NYISO
 - Posted with the September 20, 2019 MTF meeting materials
 - [August 8, 2019 AEMA Comments](#)
 - [August 16, 2019 AEMA Comments](#)
- The comments of the presenter and views contained within the presentation materials do not necessarily reflect the views of all AEMA members

MSE Application Documents and Process

- Section 2 - Organization Information
 - Concern of requirement for MSEs to submit any significant or material changes to its Organization Information prior to those changes taking effect
 - Certification of MSE employees having appropriate training
 - Does NYISO plan to maintain a list of certifications or training that they will check MSE qualifications against for initial MSE application approval?
- Section 2.3 – Documentation Checklist
 - Applicable Munis in which SCRs currently, or may eligible to participate, should be included in the list of Utility service territories in which meter services will be provided
- Concern about timeline of review and ability of NYISO to approve MSEs in time for start of Summer 2020 Capability Period

MSE Manual: Meter Inventory

- Section 2 – Roles and Responsibilities
 - Concern at lack of role defined for Member Systems (MS)/TO/Muni
 - MSEs that rely upon KYZ pulse meters and data loggers from existing MS/TO/Muni meters will be required to gather information on existing TO/Muni metering equipment in support of Meter Inventory process.
 - Without a defined role and requirement for these entities in the MSE Manual to supply the information required of MSEs, AEMA foresees this becoming a bottleneck and lead to inability to obtain required information.
 - As the Meter Inventory will be updated as frequently as monthly (as new Resources are enrolled or equipment changes at a facility), in addition to the proposed annual report requirement), timely access to support SCR/EDRP/DADRP enrollments will be key to allow resources to enroll and maintain good standing with NYISO.
 - SCR/EDRP/DADRP Resources located behind Munis may be further disadvantaged as staffing and resource constraints may hinder MSE access to the information required.

MSE Manual

- General Comments
 - Concerns that the lack of more specific details of documentation required for the Infrastructure Plan, Meter Installation, and Data VEE will cause MSE applications to be rejected
- Section 3.2.2 – Infrastructure Plan
 - Concern that NYISO should not be defining standards/practices for data servers used to host data
 - While most facilities likely comply with, or exceed these standards, prospective MSEs feel the documentation required to comply will be extremely difficult to supply.
- Section 5.2 – Meter Installation
 - Sub-contracting field installation work
 - If an MSE chooses to sub-contract the field installation work, will the sub-contractor need to become an MSE itself?
- Section 7 – Data Validation, Editing, and Estimation
 - Data validation – NYISO requires MSEs to specify the frequency of data validation
 - Does NYISO have a preferred timeframe?
 - Concerns that compressed timeframes (i.e. quarterly or less) for KYZ pulse logger-based data will require additional Letter of Authorization (LOA) requests and fees to obtain utility data against which to perform the validation, resulting in increased costs and resource requirements to handle higher volumes of MP/MSEs
 - Utilities often charge \$60-\$120 per LOA, and LOAs may only be valid for 30-90 days. Participating customers may not be willing to continue keeping up with executing LOAs, resulting in customer attrition.

Outstanding Questions for NYISO

- Does NYISO have a published timeline for an approval process for meters that have been designated as “invalid” to “valid”?
- How will MSE costs be calculated and applied to MPs utilizing MSE services?
- How will NYISO (or 3rd party) audits be conducted, and how will costs be calculated? To whom will MSE audit costs be allocated?
- Will the Revenue Metering Requirements Manual be updated to reflect references to MSEs as necessary within section 3.3?

AEMA Recommendations (1)

- AEMA recommends the NYISO to work with NYS TOs and other applicable parties to develop the process to provide the NYISO information on metering equipment – utilized to support meter data associated with resources – that is owned, installed, calibrated, and maintained by TOs.
 - Currently there is no a process for TOs to share information about their metering equipment changes with MSEs
 - TOs metering equipment is under the PSC’s jurisdiction
- MSE Manual Section 2 – Roles and Responsibilities should be enhanced to define role and responsibilities for TO/munis (otherwise Member Systems)

AEMA Recommendations (2)

- AEMA recommends the NYISO clarifies the costs of audits NYISO intends to do pursuant to Section 13.3.2.3 of the Services Tariff
- AEMA recommends that the NYISO send a communication out to all affected MPs on implementation schedule, and MSE application timeline
- AEMA recommends that the NYISO change requirement for updates to Organization Information from “prior to those changes taking effect” to “as soon as practicable”

Questions?

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