## Comverge/Enerwise Comments on the Preliminary Scope of
Donna Pratt's "SCR Baseline Study" Presentation, 8/20/2012 Joint PRL/ICAPWG

These comments pertain to the "Preliminary Scope" slide of the SCR Baseline Study presentation. We ask the NYISO and ICAP/PRLWG members to take the following into consideration when developing the scope of the study:

- The CBL's strong link to volatile weather trends, which produces a baseline that oftentimes does not reflect usage on the event day; load on a very hot day is being compared to usage on cooler days (as during the June 20th – 22nd events, see below)
- Whether the weatherization cap of 120% needs to be altered to suit NY's climate
- If non-CBL baselines – such as an ERCOT-esque Matching-Day baseline can be added to the study scope, as well as a 4-out-of-10 or 3-out-of-10 CBL to suit load driven by air-conditioning. There may not be 5 similarly hot days in the 10 CBL days, but the 10-day window cannot be expanded for a resource because usage during those 10 days is within its "average event period usage level."

## NYC Load during 6/5-6/18 CBL Window vs. 6/20 and 6/21 Event-Day Loads, with Weather-Adjusted CBLs for NYC Load
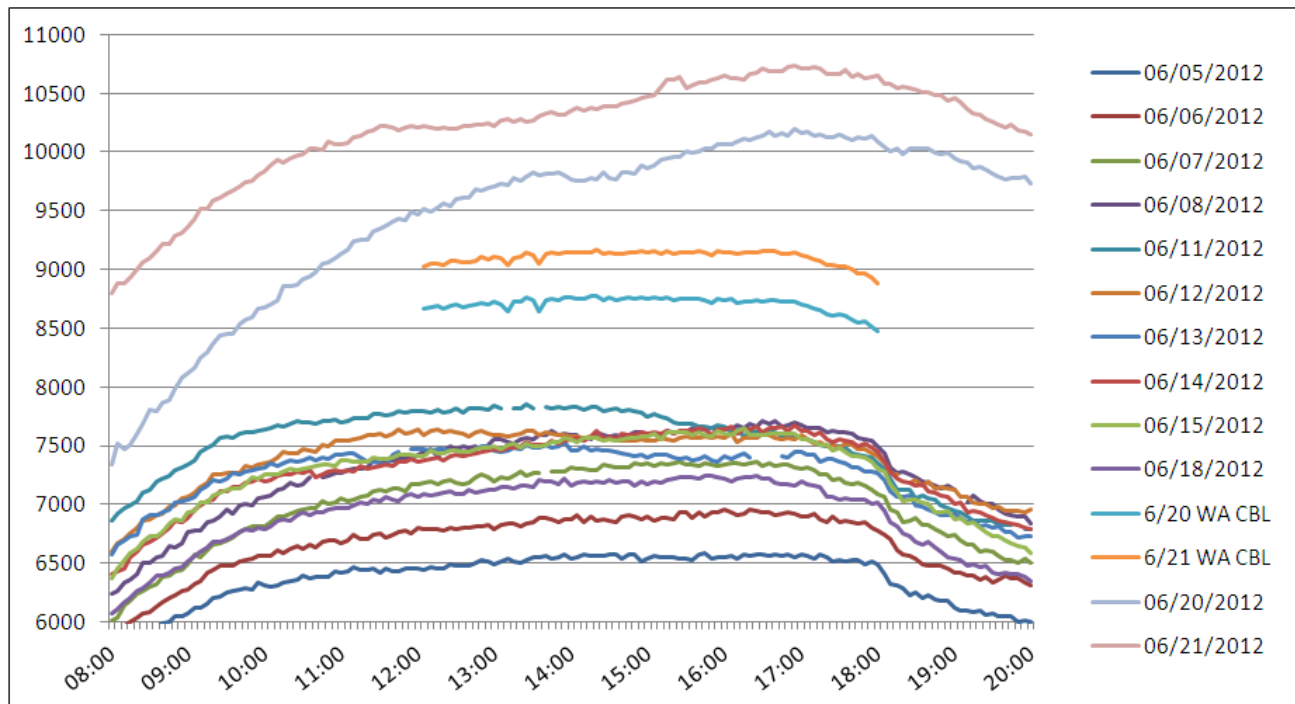
Below please find the temperature highs in NYC during the CBL windows for the June SCR events and the July 18th event. On average, highs during the 6/21 CBL window were 78% of the 6/21 high; for the 7/18 event they were 89%. Such fluctuations do not create a consistent baseline.

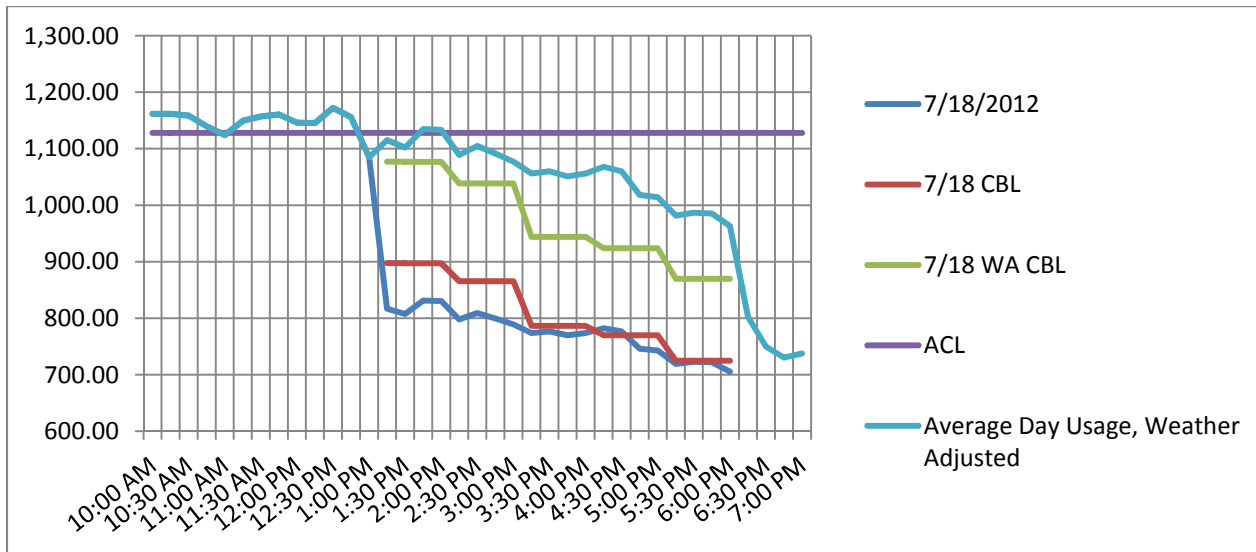## Temperatures during CBL Days vs. 6/21 and 7/18 Event Days
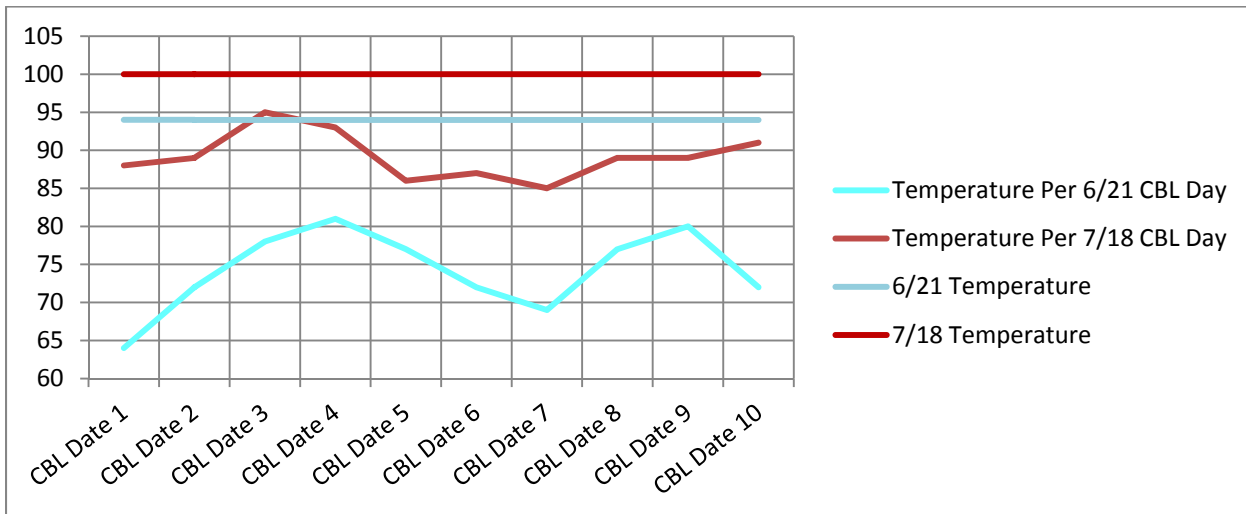
The impact on a representative SCR below:

June 21st
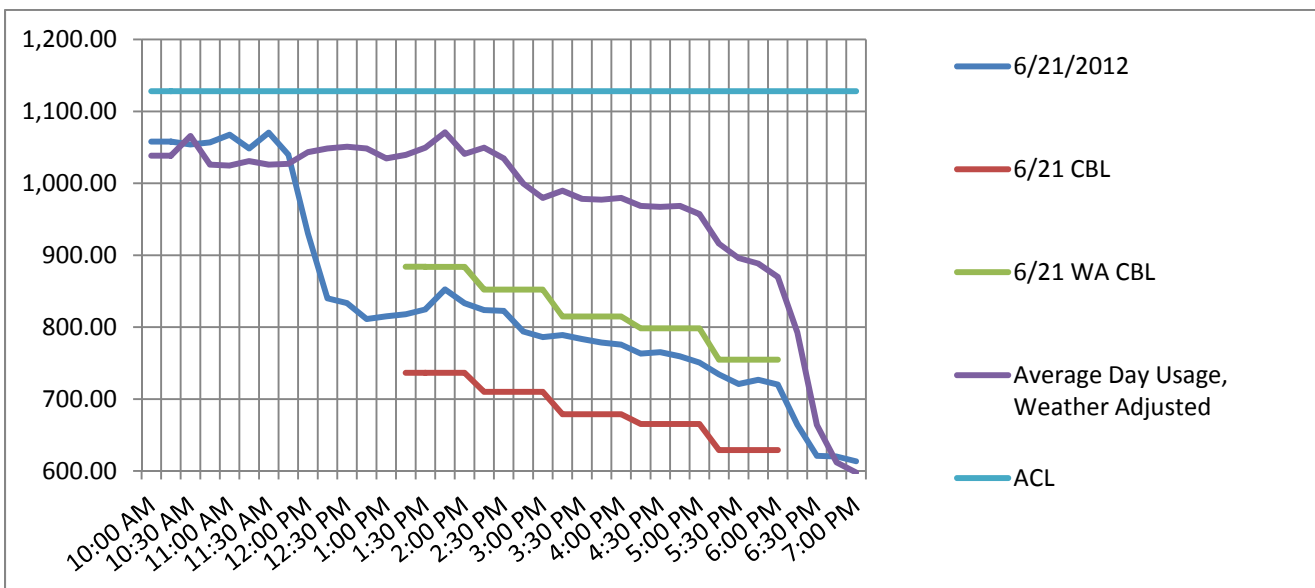
July 18th

With a weather adjusted CBL, this SCR drops 250 kW at the onset of the event and receives credit for 40 kWs on 6/21. For almost identical performance on 7/18, the resource receives an average credit of 196 kWs across the event.

ERCOT's Matching Day Pair Model's strength lies in the fact that it does not assume that immediately preceding days are predictive of usage for the resource. 10 matching-days' usage forms the baseline. These days are found by calculating the sum of squared differences for each time interval during the event day/prior day against every similar interval for the past year. This works well for an emergency program activated on short notice, as in-day load represents business-as-usual load. In NY, however, many customers pre-cool, catch up on production, or conversely, run limited production, or even close for the day – based on the day-ahead advisory. These factors erode the accuracy of inclusion of in-day data in a baseline. The Matching-Day is also complicated to calculate, which will complicate program administration. An ACL approach seems to be a strong yet much simpler variation on a matching-day approach.   It is also the most in-synch with the NYISO's intent to tie the baseline to system load.

Thank you for your consideration,

Stephen Geoghan