

Feedback for NYISO on Meter Data Study Project

We are writing to provide our recommendations for topics and questions to include in NYISO's Meter Data Study Project. As conveyed during the 5/23 MIWG/PRLWG call, it is imperative that metering and telemetry does not serve as barriers to entry for Distributed Energy Resources. Other markets have proven that system operators can reliably operate the system without unreasonably costly metering & telemetry requirements. As pointed out by Staff from the NYPSC, the NYISO should not go into the study with a pre-determined conclusion or leaning that generators and DERS should face identical treatment for metering & telemetry. The NYISO should have an open mind and let the findings of the study determine the requirements for DERs. Sensible policy specific to DERs should dictate metering and telemetry requirements for DERs, and not simply a copy of what is already in place for generation.

Our recommendations are as follows:

1. NYISO should clearly state their objective in gaining access to customer data through telemetry. If the NYISO wants to know whether a resource is available, NYISO should consider whether six-second telemetry is the best means to achieve that objective. In the case of load curtailment, telemetry only reflects consumption of an aggregated resource, not availability. In fact, consumption is often a poor proxy for availability, given that only a fraction of many customers loads are curtailable. Instead of focusing so heavily on telemetry, the NYISO should shift focus to availability reporting at the resource level, as this is what should be most valuable to system operators.

For aggregations of smaller customers such as residential customer loads, telemetry is simply not feasible. The advent of residential demand response aggregations will depend upon the implementation of AMI in NY. What a residential aggregator can do is monitor its own fleet of devices, and provide the NYISO with a forward-looking projection of availability. The practical means to validate this resource is to test or deploy the resource routinely, periodically. AMI interval data can be used to prove up performance after the fact.

2. NYISO should explore the different operating characteristics of DERs and generation, and consider whether identical metering & telemetry requirements are necessary given these different operating characteristics. These characteristics should include how correlated non-performance is amongst the individual parts that comprise a resource. In the case of generation, there is only one resource, and if a generator suddenly trips off-line, the entire resource disappears. In the case of DERs, a customer's ability to perform is not correlated with another customer. Moreover, given that NYISO is proposing to limit aggregation to the nodal level for resources participating in the energy & ancillary market, most resources will be small (i.e. < 10 MW). The NYISO should consider whether they need insight every six seconds into such small resources, especially since this insight will only reflect consumption, not availability. At the 5/23 meeting, the point was made by generator interests that the NYISO needs to plan for the DER market growing to 1,000 MW. However, whether the market is 100 MW or 1,000 MW, individual customers will perform independently of one another.

3. The NYISO should examine telemetry requirements in other markets for DERs, and consider applying them in New York. In California, telemetry is not required for resources less than 10 MW. For residential customers, ERCOT uses a minimum of two tests or events per month, and settles based on after-the-fact performance. In ISO-NE, five-minute telemetry is required for all resources providing energy & 30 minute reserves, and one-minute telemetry for resources providing 10-minute reserves. (Note that while this works better for larger customers, residential load aggregations are nonexistent in NE.) The cost of these requirements is significantly less than six-second telemetry.
4. The NYISO should investigate data accuracy standards, and resubmission deadlines for settlement data. This is another area where DERs are very different from generation, in that there is only one stream of data for a generator, but a DER resource could be comprised of many individual customers, and need more time for data resubmission.
5. NYISO should seek feedback from stakeholders on the costs of different levels of telemetry requirements, as well as the cost of streaming data in real-time to several DSPs instead of just the NYISO. This feedback should funnel into a cost/benefit analysis that examines the market impact if telemetry requirements serve as a barrier to DER entering the market (i.e. less capacity and competition). The NYISO should account for this analysis in determining its telemetry requirements.
6. The NYISO should convene DSPs and DER providers to understand how the DSPs AMI deployments could be leveraged to meet NYISO needs and system requirements. The NYISO should also explore with DSPs and the PSC whether the DSPs need real-time visibility for non-export resources or resources with negligible export.

We thank the NYISO for their consideration of this feedback and welcome any questions.

Sincerely,

Advanced Energy Management Alliance*
Energy Spectrum
EnerNOC
Natural Resources Defense Council
Whisker Labs

*AEMA is a trade association under Section 501(c)(6) of the Federal tax code whose members include national distributed energy resource (“DER”), demand response (“DR”), and advanced energy management service and technology providers, as well as some of the nation’s largest consumer resources, who support advanced energy management solutions due to the electricity cost savings those solutions provide to their businesses. These comments represent the opinions of AEMA as an organization rather than those of any individual association members.