

Comverge/Enerwise Comments on Innoventive Power’s “Provisional ACLs for SCRs” Presentation, 3/13/2012 ICAPWG

As we believe Craig Gruber of Innoventive adequately explained the need for a process to increase baselines when a permanent change of load occurs, our comments focus on the actual process we would like to be put in place to handle such requests.

Option #1 for processing baselines increases:

RIP submits interval data representing a change in load to the NYISO.

Without creating a completely new or manual data handling process, the DRIS enrollment template would be used. This, however, requires 40 ACL hours, that are attached to time/date stamps from the previous like capability period. This would be inefficient in the following circumstances:

1. The change of load occurs towards the end of a capability period, thus the RIP is registering the change for the following period, without new interval data from the period the change is for to support the claimed change in load. For example, a change being registered in March that would increase May’s baseline. Higher May usage is anticipated based on year-to-year comparisons or a planned building expansion, but not off of actual summer data.
2. New higher peak usage occurs for an SCR, but not during ACL periods. This would leave a hole for SCRs to report a change of load using non ACL hours, defeating the purpose of adapting a coincident baseline.

Option #2 for processing baselines increases:

Current Change of Load form or Change of Status form updated to facilitate changes that are not shutdowns.

New baseline is made provisional and subject to after-period ACL verifications. Further, language is added to the ICAP Manual, optimally to section 4.12.4.3, “Changes to ACL,” that would elaborate on this:



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“For SCRs where an increased baseline is attested to via a Change of Status form, the baseline will be made provisional at the new value reported by the RIP. The resultant provisional baseline will be subject to after period verification and shortfall calculations in the same manner as all provisional SCRs that do not have ACL data from the prior like capability period. The new provisional baseline cannot be altered for the remainder of the capability period. The SCR will also be provisional for the following capability period. The provisional ACL for the capability period following the change of status may not be lower than the ACL during the prior like capability period.”

The last three sentences will provide a market check against capriciously increasing and decreasing ACLs. The after-period ACL verification recalculates resource, MP, and aggregation performance factors, providing a very strong incentive for RIPs to report only legitimate changes in load upwards.

We support Option #2, due to its simplicity and market checks. Option #1, or any alternative that exposes NYISO staff to the analyses done by RIPs to identify changes in load, will prove burdensome to the NYISO.

In closing, we would like two questions raised when this is discussed at the ICAPWG:

- 1) If such changes of status will apply to SCRs with ACLs less than 500 kW
- 2) If, for such changes made *after* the capability test, the new provisional ACL will be used to calculate performance.

Respectfully Submitted:

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