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VIA ELECTRONIC MAIL

Mr. Chris Russell
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RE: NYISO's Metering Service Entity Documentation

Advanced Energy Management Alliance ("AEMA")¹ appreciates the NYISO's multi-year initiative to enhance participation of distributed energy resources ("DERs") in the NYISO markets and significant progress achieved to develop a robust set of rules for Metering Service Entities ("MSE") to replace the New York Public Service Commission's rules for Meter Service Providers and Meter Data Service Providers.²

These comments are submitted to NYISO Staff's request for comments on the documents presented during the Metering Task Force ("MTF") meeting held on August 9, 2019

¹ [AEMA](#) is an alliance of providers and supporters of distributed energy resources united to overcome barriers to nationwide use of distributed energy resources, including demand response and advanced energy management, for an environmentally preferable and more reliable grid. We advocate for policies that empower and compensate customers to manage their energy usage to make the electric grid more efficient, more reliable, more environmentally friendly, and less expensive.

² On February 8, 2019, the NYPSC issued an Order terminating the MSP and MDSP programs. <http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={052B777B-CEBF-4D02-89DE-3901A6FB0F20}>; On February 27, 2019, the NYISO issued Technical Bulletin 247 stating that it would allow RIPs and CSPs to use MSPs and MDSPs through October 31, 2019 to avoid disruption in the NYISO ICAP market. <https://www.nyiso.com/documents/20142/2931465/TB-247-v2019-02-27-Final.pdf/bfbf88e4-9e31-8a86-41be-3a45faf0548f> ("TB 247").

(“August 9th Meeting”). In addition to the comments AEMA submitted to the NYISO on August 8, 2019 that focused primarily on the process and timeline presented to stakeholders during the July 30, 2019 MTF meeting, AEMA has significant concerns regarding the documentation and processes discussed during the August 9th Meeting.

I. Feedback on MSE Required Documentation

AEMA thanks the NYISO for providing a draft of the MSE Application³ and Meter Inventory Template⁴ forms as a starting point for stakeholder discussion during the August 9th Meeting. While the discussion was informative to stakeholders, AEMA and its members still believe the forms and the direction the NYISO has provided thus far does not provide sufficient guidance to companies that are interested in applying to become MSEs to begin working to develop or compile the necessary documentation to be supplied once the NYISO is able to begin accepting applications.⁵

a. MSE Application

AEMA believes the MSE Application presented by the NYISO is a great first step to outline what information should be required of companies applying to become an MSE. However, AEMA has concerns that, in the absence of more definition for several areas of the requirements, companies will not have certainty on what is required, and has

³ See <https://www.nyiso.com/documents/20142/7889242/DRAFT-MSE%20Registration%20Packet.pdf/45614243-7c1d-ad44-026f-ee19313833b3>

⁴ See https://www.nyiso.com/documents/20142/7889242/MSE_Meter%20Inventory%20Template.pdf/d8015202-6c3a-6bba-7aaa-c12532fd51ba

⁵ During the August 9th Meeting, NYISO staff stated that the earliest date they could officially begin accepting applications is November 1, 2019. NYISO staff also indicated that they intend to allow a waiver period of 60 days following November 1, 2019 for companies applying to become MSEs to become certified.

concerns that several sections of the MSE Application will be redundant for existing Market Participants (“MPs”).

In Section 2.1 of the MSE Application, the sub-requirements 2.1.1, 2.1.2 address requirements that should not be applicable to existing MPs. Existing MPs would already have provided all the necessary documentation listed in these sections at the time of executing the agreements to become MPs. AEMA recommends making these sections optional for existing MPs. AEMA also agrees with other stakeholders’ comments during the meeting that the NYISO retain these requirements for companies that seek to become a NYISO Guest to be able to apply as a MSE. AEMA renews its prior request that a self-certification process be utilized to minimize areas of uncertainty in the MSE Application process and rely on widely recognized standards.⁶

In section 2.1.5 regarding insurance requirements for MSEs, while AEMA notes that the NYISO is still evaluating insurance requirements for MSEs, AEMA recommends that requirements should be reasonable and not pose a barrier to entry to companies seeking to become certified MSEs. Under the tight timeframe that the NYISO is seeking to set up the MSE construct, it is in all parties’ best interest to finalize these requirements as quickly as possible.

Within the Infrastructure Plan, the level of detail provided for each of the subsections is insufficient to provide well-defined guidance to companies that intend to apply to become MSEs. It is unclear based upon the current version, with exception of the subsections requesting attestations of certain processes being in place, what

⁶ *Comments Of Advanced Energy Management Alliance On Order On Complaint, Denying Tariff Waiver, And Establishing A Paper Hearing*, Docket No. EL18-188-000 (February 4, 2019).

information, and to what level of detail, will be required by the NYISO from applicants. It is paramount for the NYISO to make MSE review and evaluation criteria available to the market place in advance in order to avoid review process delays and potential contentions between the NYISO and applicants. Efficient metering rules should be clear to MSEs and lack potential for misinterpretation, as well as provide sufficient flexibility to accommodate a wide range of metering equipment and business models.

AEMA understands that the key goal of the MTF is to work through these issues, but at the current time, AEMA believes potential MSE applicants will have difficulty developing or collecting the information necessary to submit applications that they are certain will meet all of the MSE Application to become approved. AEMA would like to reiterate the concerns expressed in our August 8th comments that the MSE implementation timeline, particularly with its proximity to when these issues will be sorted out compared to the Winter 2019/20 Capability Period SCR enrollment deadline will create undue risks for existing RIPs and CSPs.

b. Meter Inventory Template

While AEMA does not take issue with the Meter Inventory Template as described by NYISO Staff during the August 9th Meeting is already in use today with Transmission Owners (“TO” or “TOs”), AEMA believes the process proposed by the NYISO is too onerous for potential MSEs to support. The general process proposed by NYISO staff was that MSEs would provide an annual filing utilizing the template with each piece of metering equipment utilized to support the provision of meter data associated with each Resource for settlement purposes. MSEs would also be expected to provide an updated

file any time a piece of equipment is newly installed or replaced at the Resource. At face value, this seems like a reasonable request. However, the NYISO went on to state that the equipment MSEs would be responsible to maintain records for would also include all metering equipment owned, installed, calibrated, and maintained by the respective TO. The NYISO should not make this a requirement of MSEs as it would introduce a need to develop a process for all TOs to share information about all their equipment changes with MSEs in order for MSEs to remain in compliance with the yet-to-be-drafted Meter Service Entity Manual (“MSEM”). This process is one that neither prospective MSEs nor TOs are likely prepared to support at this time. This process would be in addition to any other manual processes that MSEs would need to set up to support becoming an MSE and would be outside of NYISO-administered market processes due to NYS PSC’s jurisdiction over the TOs metering equipment requirements.

As NYISO staff stated during the August 9th Meeting, they already receive Meter Inventory forms from TOs directly as a part of their annual filing. It is unclear to AEMA as to whether intra-year updates are also required to be submitted to the NYISO by TOs. AEMA recommends that the NYISO limit the required Meter Inventory form to *only* require reporting equipment owned and/or maintained by a certified MSE on an annual basis, and to provide updates as new equipment is installed or replaced as required by the ISO Procedures for all other resources.

II. Request for Notice to Market Participants and Future Feedback

AEMA recommends that the NYISO Stakeholder Services team send a communication out to all MPs to notify them of the issues being worked on within the

MTF. To date, only three MPs to AEMA's knowledge have been actively engaged in the MTF meetings. As this process will likely impact more MPs than are currently engaged and participating in these meetings, AEMA thinks it is in the best interest of the market to make sure all parties that will be impacted by the new MSE construct have ample opportunities to participate in the stakeholder process.

Due to the tight time frame for the request for comments and the time of year, several employees that AEMA member companies plan to consult to provide more relevant input in this process are unavailable on vacation. AEMA and its members look forward to additional opportunities to provide more detailed feedback to the NYISO on recommended approaches to the MSE construct throughout its development and implementation, and will do so once it is able to develop this feedback.

III. Conclusion

AEMA thanks the NYISO for their continued work on this important effort and appreciates the opportunity to provide feedback. AEMA thanks the NYISO for consideration of these comments and welcomes the opportunity for further discussion. We welcome any discussion or questions, and encourage you to contact Katherine Hamilton, Executive Director of AEMA, at 202-524-8832 or Katherine@aem-alliance.org should you wish to meet with AEMA.

Respectfully Submitted,



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