**PRR 1174 Comments**

**New Demand Response BPM**

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| **Submitted by** | **Company** | **Date Submitted** |
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Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on PRR 1174, “New Demand Response BPM and language for energy storage and distributed energy resources 3a initiative.” PG&E appreciates the development of a Demand Response BPM to better manage the implementation details of demand response and includes a few high-level comments in addition to the tracked changes in the BPM draft.

1. PG&E requests that CAISO clarify if or how the DR BPM will impact the DR User Guide.
	1. PG&E notes some information in the User Guide is redundant of the BPM. Will CAISO maintain both documents? How should stakeholders use each document?
2. As the BPM applies to DR implementation including all phases of ESDER, PG&E recommends the BPM not be the “ESDER 3A” BPM. Accordingly, PG&E recommends CAISO removing the title reference to ESDER 3A.
3. To make the BPM more intuitive for users, PG&E recommends the BPM have the following format – which also matches the ESDER format – of pre-market activities, market activities, and post-market activities.