



## Stakeholder Comments Template

### Resource Adequacy Enhancement Initiative: Second Revised Straw Proposal

This template has been created for submission of stakeholder comments on the **Resource Adequacy Enhancements Initiative, Second Revised Straw Proposal** that was held on October 9, 2019. The meeting material and other information related to this initiative may be found on the initiative webpage at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/ResourceAdequacyEnhancements.aspx>

Upon completion of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com). Submissions are requested by close of business on October 24, 2019.

| Submitted by       | Organization   | Date Submitted          |
|--------------------|--|-------------------------|
| <i>Paul Nelson</i> | <i>California Large Energy Consumers Association (CLECA)</i> | <i>October 24, 2019</i> |

**Please provide your organization's comments on the following topics. When applicable, please indicate your organization's position on the topics below (Support, Support with caveats, Oppose, or Oppose with caveats). Please provide examples and support for your positions in your responses.**

#### System Resource Adequacy

##### 1. Determining System RA Requirements

Please provide your organization's feedback on the System RA Requirements proposal as described in the second revised straw proposal.

As CLECA has commented previously, there needs to be coordination with the CPUC to prevent two different accounting methodologies for RA.

##### 2. Forced Outage Rates Data and RA Capacity Counting

Please provide your organization's feedback on the Forced Outage Rates and RA Capacity Counting and Forced Outage Rate Data topics as described in the second revised straw proposal.

CLECA has no comments at this time.

### **3. Proposed Forced Outage Rate Assessment Interval**

Please provide your organization's feedback on the Proposed Forced Outage Rate Assessment Interval topic as described in the second revised straw proposal.

CLECA has no comments at this time.

### **4. System RA Showings and Sufficiency Testing**

Please provide your organization's feedback on the System RA Showings and Sufficiency Testing proposal as described in the second revised straw proposal.

CLECA has no comments at this time.

### **5. Must Offer Obligation and Bid Insertion Modifications**

Please provide your organization's feedback on the Must Offer Obligation and Bid Insertion Modifications proposal as described in the second revised straw proposal.

CLECA still does not support automatic bid insertion for Reliability Demand Response Resource (RDRR) for the reasons described in its prior comments and those of Southern California Edison (SCE). CLECA previously expressed concern that if proxy demand response programs are exempt from automatic bid insertion, the same reasons for their exemption should also apply to RDRR.<sup>1</sup> In addition, SCE previously commented that the proposal fails to specify how the quantity value of a weather sensitive RDRR program is determined for bid insertion.<sup>2</sup> The current proposal does not address these concerns.

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<sup>1</sup> CLECA, July 24, 2019. [Comments on the Revised Straw Proposal](#), Page 3.

<sup>2</sup> SCE, July 24, 2019, [Comments on the Revised Straw Proposal](#). Page 4.

If CAISO is determined to perform automatic bid insertion for RDRR, CLECA would support the proposal to use the bid cap for the automatic bid insertion price value. This is consistent with a reliability program being dispatched after other economically bid resources. However, we reiterate that SCE's concern about determining the quantity of RDRR for the automatic bid insertion has not yet been addressed, and CLECA shares that concern.

CLECA remains concerned that RDRR is being treated differently than proxy demand resources (PDR); the latter are exempt from automatic bid insertion. Proxy demand resources should be dispatched prior to the CAISO's issuing a Warning or Stage Emergency. Thus, the CAISO should consider equal treatment for PDR and RDRR regarding automatic bid insertion rules.

## **6. Planned Outage Process Enhancements**

Please provide your organization's feedback on the Planned Outage Process Enhancements proposal as described in the second revised straw proposal.

CLECA has no comments at this time.

## **7. RA Imports Provisions**

Please provide your organization's feedback on the RA Imports Provisions proposal as described in the second revised straw proposal.

CLECA appreciates the effort CAISO has made in developing analysis to better understand the bidding behavior and delivery of import RA. Slide 77 concluded that non-delivery is low and consistent with the forced outage rates of internal RA resources. In addition, it appears from Slide 78 that non-delivery appears to be limited to a few scheduling coordinators. Therefore, implementing highly restrictive rules for import RA appears unnecessary. The proposal to require provision of information regarding the source of the balancing authority on monthly showings may be a reasonable compromise.

## **Flexible Resource Adequacy**

### **8. Identifying Flexible Capacity Needs and Requirements**

Please provide your organization's feedback on the Identifying Flexible Capacity Needs and Requirements topic as described in the second revised straw proposal.

CLECA has no comments at this time.

### **9. Setting Flexible RA Requirements**

Please provide your organization's feedback on the Setting Flexible RA Requirements topic as described in the second revised straw proposal.

CLECA has no comments at this time.

### **10. Establishing Flexible RA Counting Rules: Effective Flexible Capacity Values and Eligibility**

Please provide your organization's feedback on the Establishing Flexible RA Counting Rules: Effective Flexible Capacity Values and Eligibility topic as described in the second revised straw proposal.

CLECA has no comments at this time.

### **11. Flexible RA Allocations, Showings, and Sufficiency Tests**

Please provide your organization's feedback on the Flexible RA Allocations, Showings, and Sufficiency Tests topic as described in the second revised straw proposal.

CLECA has no comments at this time.

### **12. Flexible RA Must Offer Obligation Modifications**

Please provide your organization's feedback on the Flexible RA Must Offer Obligation Modifications topic as described in the second revised straw proposal.

CLECA has no comments at this time.

## **Local Resource Adequacy**

### **13. UCAP for Local RA**

Please provide your organization's feedback on the UCAP for Local RA topic as described in the second revised straw proposal.

CLECA has no comments at this time.

### **Additional comments**

Please offer any other feedback your organization would like to provide on the RA Enhancements Initiative.