California ISO

Stakeholder Comments Template

Resource Adequacy Enhancements

This template has been created for submission of stakeholder comments on the Resource Adequacy Enhancements working group on June 10, 2020. The stakeholder call presentation, and other information related to this initiative may be found on the initiative webpage at: http://www.caiso.com/StakeholderProcesses/Resource-Adequacy-Enhancements

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **June 24, 2020**.

Submitted by	Organization	Date Submitted
Evelyn Kahl, (415) 254-5454	California Community Choice Association[1]	*June 24, 2020*

Please provide your organization's comments on the following issues and questions.

1. Production Simulation: Determining UCAP Needs and Portfolio Assessment

Please provide your organization's feedback on the Production simulation: Determining UCAP needs and portfolio assessment topic as described in slides 4-15. Please explain your rationale and include examples if applicable.

CalCCA continues to support CAISO's proposal to perform a stochastic assessment of the RA portfolio using the PLEXOS model. We look forward to the results of CAISO's testing of the model using the existing RA portfolio which will inform discussions about setting the UCAP requirements and identifying the criteria for CPM designations.

[1] California Community Choice Association represents local government Community Choice Aggregation electricity providers in California members, including Apple Valley Choice Energy, CleanPowerSF, Clean Power Alliance, Desert Community Energy, East Bay Community Energy, Lancaster Choice Energy, Marin Clean Energy, Monterey Bay Community Power, Peninsula Clean Energy, Pioneer Community Energy, Pico Rivera Innovative Municipal Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Jacinto Power, San Jose Clean Energy, Silicon Valley Clean Energy, Solana Energy Alliance, Sonoma Clean Power, Valley Clean Energy, and Western Community Energy.

2. Transitioning to UCAP Paradigm

Please provide your organization's feedback on the transitioning to UCAP paradigm topic as described in slides 16-19. Please explain your rationale and include examples if applicable.

CalCCA supports Option 1: a two step de-rate process to resource QCs, that first adjusts for deliverability to derive Deliverable QC (DQC) and then applies the forced outage non-availability UCAP factor to derive the NQC. This is consistent with the current commercial approach that puts the burden of forced outages on the resource sellers and would avoid the need to make changes to existing RA contracts. CalCCA believes it is preferable to make any necessary changes to CAISO Tariff references to NQC that will need to refer to DQC, than to change many more RA contracts to accommodate the use of the UCAP terminology that would be needed with Option 2.

CalCCA supports using the 2022 RA year to shadow test UCAP RA requirements and showings, but to defer binding implementation of UCAP until the 2023 RA year.

3. Unforced Capacity Evaluations

Please provide your organization's feedback on the unforced capacity evaluations topic as described in slides 20-59. Please explain your rationale and include examples if applicable.

CalCCA supports the annual development of monthly NQC and UCAP values for each resource, based on the seasonal UCAP factors that are derived from historical forced outage and urgent outage data consistent with RC procedure RC0630, with planned outages and opportunity outages not being incorporated into the UCAP calculations.

a. Please provide your organization's feedback on the UCAP methodology: Seasonal availability factors topic as described in slides 27-46. Please explain your rationale and include examples if applicable.

CalCCA supports the development of seasonal UCAP values (May-September and October-April)[2] to incorporate potentially different levels of unit reliability during different seasons.

CalCCA appreciates the CAISO's willingness to include significantly more hours in its assessment of the supply cushion than in its previous proposal. Using the top 20% of the tightest supply cushion hours for each season seems much more likely to provide a reasonable representation of each resource's availability. We request, however, that the CAISO provide more information about the impact of applying the proposed methodology to existing resources using actual historical data than was presented for the three example resources. That is, CalCCA would like CAISO to present information about the number of resources and MW that fall into different ranges of UCAP values for each season (e.g., 100-98%, 97.99-96%, etc.). We also request that the resource-

[2] The CAISO should coordinate with the CPUC to ensure consistency on the definition of the summer/on-peak period.

specific UCAP calculations be provided to the Scheduling Coordinator for each resource.

CalCCA supports using 45% weight for the most recent year's seasonal availability factor, 35% weight for the second year, and 20% weight for the third year for existing resources.

For resources for which resource-specific data is not yet available, CalCCA supports Option 1, using class average data (presumably weighted average) to substitute for the resource specific data until such data is available. We believe that Option 2 places too much weight on a single year's performance.

b. Please provide your organization's feedback on the UCAP methodologies for non-conventional generators topic as described in slides 47-59. Please explain your rationale and include examples if applicable.

CalCCA seeks clarification from CAISO, as discussed during the June 10 stakeholder call, that End of Hour State of Charge (EOH SOC) factors that are tied to Day Ahead Market awards will not be included in storage resource UCAP calculations in addition to forced outage rates. CalCCA also seeks clarification that storage resources that use market bids to manage their state of charge will not be required to submit outage cards that will affect their UCAP calculations. That is, storage resources that have been optimized by the CAISO in its markets will not be treated as having forced outages due to being fully charged or fully discharged.

For resources with QC values calculated using an ELCC methodology (e.g., wind and solar resources), CalCCA supports using the ELCC value as the UCAP value.

CalCCA supports removing forced outage replacement and RAAIM application to forced outage periods, since UCAP will provide the proper incentives and will result in LSEs collectively providing the replacement capacity that is expected to be needed.

Additional comments

Please offer any other feedback your organization would like to provide on the Resource Adequacy Enhancements working group discussion.