



Policy Initiatives Catalog Submission Form

This purpose of this form is to propose potential policy initiatives that require a stakeholder process and typically require tariff changes. Do not use this form to request or propose process improvements or administrative changes. Such requests should be made through your Customer Service Representative or Account Manager.

California ISO Policy Initiatives Catalog Submission Form

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Submitter Information

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Please provide a title for the issue.

Energy Storage Resource Participation in Residual Unit Commitment

Please provide a summary description of the issue (i.e. 500 words)

Currently CAISO does not allow energy storage resources to receive RUC Certification in Generator Resource Data Templates and thus energy storage resources are not able to participate in the RUC process. CAISO Tariff § 31.5.1 does not mention energy storage resources being prohibited from RUC, and in fact explicitly requires RA resources to participate in RUC. Many of the existing, and soon to be online energy storage resources are RA resources. Prohibiting them from participating appears inconsistent with the tariff. Since energy storage capacity is growing faster than any other dispatchable resource in the system, permitting its RUC certification would lower RUC costs and prepare the RUC process to avoid infeasibilities especially with the continued retirement of fossil-fueled generation resources.

Please provide any data/information available that would characterize the importance or magnitude of the issue.

In 2022, had energy storage resources participated in RUC, it could have saved up to 18% of total RUC costs or \$15.6MM system-wide. CPA’s internal analysis shows there were many hours where the RUC price was greater than \$0 and total system-wide storage generation was

greater than cleared RUC MW. The total market value of RUC during all such hours was \$15.6MM. This calculation illustrates that the scale of storage deployments is significant enough to dramatically change the market value of RUC from hour to hour. Furthermore, with storage capacity increasing by thousands of MW per year, the opportunity for storage to create RUC savings is expanding rapidly.