



# 2021 Contract Management (COMA) Enhancements Final Proposal and Tariff Language

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Stakeholder Call  
November 17, 2021

## Housekeeping reminders

- This call is being recorded for informational and convenience purposes only. Any related transcriptions should not be reprinted without ISO's permission.
- Meeting is structured to stimulate dialogue and engage different perspectives.
- Please keep comments professional and respectful.
- Please try and be brief and refrain from repeating what has already been said so that we can manage the time efficiently.

## New instructions for raising your hand to ask a question

- If you are connected to audio through your computer or used the “call me” option, select the raise hand icon  above the chat window located on bottom right corner of the screen. **Note:** #2 only works if you dialed into the meeting.
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- Please remember to state your name and affiliation before making your comment.
- You may also send your question via chat to the meeting host – Isabella Nicosia.

# Agenda

- Welcome and introduction
- CAISO as an Affected System Study Agreement
- Retirements and Repower
  - Retention of interconnection service
  - Repower study plan timeline
  - Repower language clarifications for Section 25
- Modification Adjustments
  - COD alignments with PPA (for TPD Group 3 projects)
  - Project conversions to 100% storage
  - Appendix U clarifications/updates
- Generator Interconnection Study Process Agreement effective date
- Next Steps

**Note:** The Market Quality proposal has been removed from this COMA initiative

**Note:** CAISO has kicked off the 2021 IPE initiative. Please see the [casio.com](https://casio.com) stakeholder page for details and next steps.

# CAISO Policy Initiative Stakeholder Process



# Proposed Initiative Schedule

Date	Milestone
<b>Issue Paper/Straw Proposal</b>	
August 10, 2021	Publish Issue Paper/Straw Proposal
August 17, 2021	Stakeholder meeting
August 31, 2021	Comments due
<b>Draft Final Proposal &amp; Draft Tariff Language</b>	
September 30, 2021	Publish Draft Final Proposal & Draft Tariff Language
October 7, 2021	Stakeholder meeting
October 21, 2021	Comments due
<b>Final Proposal</b>	
November 10, 2021	Publish Final Proposal
November 17, 2021	Stakeholder meeting
<b>Board of Governors, Draft BRS (if required), and Tariff Language</b>	
December 2021	Board of Governors
January 2022	FERC Filing
March 2022	FERC Order
2022 (2023 as necessary)	Policy implementation



# CAISO as an Affected System Study Agreement

- CAISO is becoming more impacted by interconnections in neighboring balancing authorities
- CAISO must review such proposed interconnections as an Affected System to ensure there are no system impacts to the CAISO grid and reliability is maintained
- **CAISO Proposal:**
  - Implement the CASSA agreement to provide a *pro forma* structure for study, deposit, and process
  - Add Section 14.5 and 14.5.1 to Appendix DD (GIDAP)
- **Stakeholder Comments:**
  - Vistra provided support for this topic
  - LSA and SEIA would seek to defer the reimbursement topic to IPE
  - Six Cities clarified its support for not reimbursing generating facilities for network upgrades needed in connection with affected system mitigations. Also provided redline suggestions to Attachment A, CASSA

# CAISO as an Affected System Study Agreement

- **CAISO proposes:**
  - Intent of introducing this CASSA agreement was to put the study structure and a *pro forma* agreement in place
  - In support of Six Cities comments, CAISO suggested redlines to the Attachment A of the final proposal
- **Tariff Language Updates:**
  - Add Section 14.5 and 14.5.1 to Appendix DD (GIDAP)
  - Include the *CAISO as an Affected System Study Agreement* into Appendix B of the tariff
  - See final proposal paper for agreement details



# Retirement and Repower Retention of Interconnection Service

- **Proposal:**
  - Clarify that Interconnection Customers will retain Interconnection Service rights concurrent with deliverability rights - three years from the date of retirement
- **Stakeholder Comments:**
  - Vistra provided support for this topic
  - LSA and SEIA suggested the CAISO clarify the meaning of the term 'construction' and the options and requirements for customers to retain deliverability and interconnection service

# Retirement and Repower Retention of Interconnection Service

- **CAISO Response:**
  - Section 6.1.3.4 of the BPM for Reliability Requirements outlines the deliverability retention rights for generators
  - Section 12 of the BPM for Generator Management outlines the effective date of a generator's retention period
- **BPM Language Updates:**
  - Through the BPM change-management process, provide clarifying language that a project's retention rights will include interconnection service rights along with deliverability retention
  - The CAISO will consider the concepts and language provided by stakeholders in the BPM change management process when implementing this topic

# Retirement and Repower:

## Repower study plan timeline

- The data from the valid repower Interconnection Request is necessary for the creation of the study plan
- The process of reviewing and validating a repower interconnection request and technical data frequently takes longer than the 10 days currently included in the tariff
  - Due to varying factors; including data requirements, volume of cluster projects, material modification requests, engineering workload, etc.
- **Stakeholder Comments:**
  - LSA and SEIA appreciated and support the inclusion of their previous suggestions
  - Vistra further suggests that the CAISO consider including a response timeline during the validation process to protect Interconnection Customers against the risk of extended validation periods

# Retirement and Repower: Repower study plan timeline

- **CAISO Response:**
  - CAISO agrees with concerns raised by Stakeholder regarding removing the 10-day response requirement
  - CAISO proposes implementing a thirty (30) calendar day requirement to tender a draft study plan from the date the IR package is deemed valid
  - The CAISO will consider including CAISO and PTO-specific response times in the BPM for Generator Management in the future
- **Tariff Language Updates:**
  - Modify the first sentence of Section 25.1.2.3 to ensure the CAISO tenders a draft study plan within thirty (30) calendar days from the date the IR package is deemed valid
  - See final proposal for details

# Retirement and Repower

## Tariff Section 25 Repower language

- **Section 25 of the CAISO tariff applies to:**
  - generating units seeking to interconnect to the CAISO Controlled Grid
  - modifications to existing generating units
  - generating units that previously operated and seek to repower their units and retain deliverability
  - and a generating unit currently identified as a qualified facility and converting to a CAISO participating generator
- **Stakeholder Comments:**
  - No further comments on this topic
- **Tariff Language Updates:**
  - Add Section 25.1(f) and clarify affidavit requirements
    - each existing Generating Unit connected to the CAISO Controlled Grid that proposes to repower its Generating Unit, is subject to Section 25.1.2

# Modifications

## Aligning COD with PPA

- TP Deliverability (TPD) allocation Group 3 allows projects to seek a TPD allocation by claiming they are proceeding without a power purchase agreement
  - With certain criteria, limitations, and requirements
- One limitation is Group 3 projects may not extend their COD beyond the date proposed in their original interconnection request
- CAISO does not prohibit Group 3 projects from subsequently seeking and executing a PPA
- Current tariff expressly exempts Group 3 projects a COD extension to allow the project's COD to align with the PPA
- **CAISO Proposal:**
  - Projects Proceeding without a PPA in TPD allocation Group 3 may align their project COD with the executed and regulatory-approved PPA even if its beyond the maximum time in queue

# Modifications

## Aligning COD with PPA

- **Stakeholder Comments:**

- LSA and SEIA inquired on the meaning of ‘automatically’ as it relates to the COD extension alignment with a PPA. Further references language that such modification is ‘approved without a MMA’ and asked for clarifications

- **CAISO Response**

- COD alignments can be effectuated via a Permissible Technological Advancement (PTA) per GIDAP Section 6.7.2.4
- COD alignments are ‘automatic’ when aligning with a PPA
  - ISD/Sync can be requested at same time
  - PTA results will identify ability to align ISD/Sync

- **Tariff Language Updates**

- Add a sentence in section 8.9.2.2 of Appendix DD clarifying the COD alignment rights for Group 3 projects per final proposal language
- CAISO will clarify BPM language in the BPM change management process during implementation

# Modifications

## Allowing projects to convert to 100% storage

- **CAISO Proposal**

- Currently, generating units are prohibited from *completely* converting from one technology to a battery energy storage system
- Allow projects to convert to 100% storage using the MMA, Post-COD modification, or repower process
  - Provided the change meets the requirements of a MMA or repower request (i.e. electrical characteristics of the plant remain substantially unchanged and other projects are not impacted)

- **Stakeholder Comments:**

- Vistra provided their support and asked that CAISO clarify that by whole conversion, CAISO means a generating facility may convert ‘up-to’ the full capacity of the generating facility to storage.



# Modifications

## Allowing projects to convert to 100% storage

- **CAISO Response**

- Generating facilities may request the conversion of all or some capacity to energy storage
- The requirements for a repowering or a post-COD modification are that the total capability and electrical characteristics remain substantially unchanged
- The requirements for a material modification assessment is that the modification has a material impact on the cost or timing of any Interconnection Request or any other valid interconnection request with a later queue priority date

- **Tariff Language Updates**

- Include language updates to section 6.7.2.5 of Appendix DD
- See final proposal for details

# Modifications

## Appendix U updates – Modifications

- Section 4.4 of Appendix U provides the rules for serial projects to request modifications prior to achieving their Commercial Operations Date
- With the evolution of the study process section 4.4.4 is now inconsistent with section 4.4.6
- **CAISO Proposes:**
  - To align the serial process to be consistent with existing modification procedures by deleting section 4.4.4 of Appendix U
- **Stakeholder Comments:**
  - No further comments to this topic
- **Tariff Language Updates:**
  - Delete Section 4.4.4 of Appendix U

# Modifications

## Appendix U updates – Restudy Timeline

- Appendix U was predicated on the previous study process: a Feasibility Study, a System Impact Study, and a Facilities Study
- These studies and re-studies are now performed in the Cluster Phase I and II studies and the annual reassessment process
- **CAISO Proposes:**
  - Delete Section 6.4 and 7.6 of Appendix U in their entirety
    - Section 8.5 of Appendix U is still needed due to a FERC settlement agreement and the CAISO will retain this section for that reason
- **Stakeholder Comments:**
  - No further comments to this topic
- **Tariff Language Updates:**
  - Delete Section 6.4 and 7.6 of Appendix U

# Generator Interconnection Study Process Agreement (Appendix 3) Effective Date

- Currently, the GISPA is effective upon submission to the CAISO
- In the queue cluster application window, projects must submit a complete package to be included in the cluster study process
- Interconnection request applications deemed incomplete are neither studied nor charged for study costs
  - Refunded 100% of study deposit
  - Until package is deemed complete the agreement is not necessary
- **CAISO Proposes:**
  - To change the effective date of the GISPA to the date the interconnection request package is “*deemed complete*”.
    - Revise Appendix DD (GIDAP) Section 3.5.1
    - Revise GISPA

# Generator Interconnection Study Process Agreement (Appendix 3) Effective Date

- **Stakeholder Comment:**
  - Vistra provide their support for this topic
- **Tariff Language Updates:**
  - Revise Appendix DD Section 3.5.1 and GISPA with the following language:
    - This Agreement shall become effective upon the date that the interconnection request package is deemed complete pursuant to Section 3.5.1 of GIDAP.

## Next Steps

- No stakeholder comments requested for this final proposal.
- For questions, please contact Jason Foster at [jlfoster@caiso.com](mailto:jlfoster@caiso.com)

# ENERGY matters

The California ISO's blog highlights its most recent news releases, and includes information about ISO issues, reports, and initiatives.



- *Energy Matters* blog provides timely insights into ISO grid and market operations as well as other industry-related news

<http://www.caiso.com/about/Pages/Blog/default.aspx>.

Click image below to read a recent article featured in the blog:



October 4, 2021  
*Markets*

## Developing an Extended Day-Ahead Market framework

By Stacey Crowley, ISO Vice President, External Affairs

The agenda for our upcoming Extended Day-Ahead Market (EDAM) Forum is set and I could not be more excited about the important conversation that will re-launch the public discussion to make EDAM a reality.

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# EXTENDED DAY-AHEAD MARKET FORUM REGISTRATION

October 13, 2021 • 8:30 a.m. - 11:30 a.m.  
Free Virtual Webinar

- **Objective:** Foster a regional discussion driven by the transformational changes and opportunities developing in the west. The forum discussion will focus on how the value of optimization and coordination of grid resources can be unlocked by expanding the ISO day-ahead market to entities within the Western interconnection.
- This forum will include discussion with industry leaders, including utility representatives, policymakers, and stakeholders across the west who will share their perspectives on key concepts and principles critical to the development of an extended day-ahead market framework.
- Visit *Extended Day-Ahead Market Forum* webpage on ISO's website [here](#) to access registration link, agenda and other event details. Registration is requested by October 12, 2021.
- Questions? Send to [ISOStakeholderAffairs@caiso.com](mailto:ISOStakeholderAffairs@caiso.com)