The ISO received 3 sets of comments on the 2024 and 2028 final Local Capacity Requirements results presented at the April 12, 2023 stakeholder call and 3 sets of comments were submitted into the CPUC process. CAISO encourages all market participants to submit comments within the CAISO process:

1. Bay Area Municipal Transmission Group (BAMx)
2. Southern California Edison (SCE)
3. Vistra Corp.
4. California Community Choice Association (Cal-CCA) – at the CPUC
5. The Green Power Institute – at the CPUC
6. Vistra Corp. – at the CPUC

Copies of the comments submitted are located on the Local Capacity Requirements Process Page at: http://www.caiso.com/informed/Pages/StakeholderProcesses/LocalCapacityRequirementsProcess.aspx.

The following are the ISO's responses to the comments.

No	Comment Submitted	CAISO Response
1	**Bay Area Municipal Transmission Group (BAMx)** **Submitted by: Paulo Apolinario**	
1a	**Please provide your organization's overall comments on the 2024 and 2028 Local Capacity Requirements Technical Study Final Results.** The Bay Area Municipal Transmission group (BAMx)[1] appreciates the opportunity to comment on the CAISO 2024 and 2028 Local Capacity Requirements (LCR) study final results discussed during the April 12, 2023 stakeholder meeting. We continue to see positive enhancements to each year's LCR analysis and look forward to continuing to work with the CAISO to improve and refine the process. BAMx applauds the CAISO's extensive efforts in putting together the analyses and graphs illustrating the comparison of the yearly load curves against the import capability of each sub-area and the peak day load profiles against the import capability. For each of the LCR areas and sub-areas, the CAISO has also identified an approximate amount of storage that can be added to each subarea from a charging restriction perspective. Over the last two years, the CAISO has made substantial refinements by including the maximum 4-hour storage estimate for each sub-area and area. However, no underlying calculations on how the CAISO derived these values have been provided, so market participants are not able to have a deeper understanding of the factors limiting the amounts of storage in each sub-area and area. BAMx understands that the CAISO utilized spreadsheets and techniques tailored to the different circumstances in the LCR areas. In response to BAMx and the other stakeholder request for providing the underlying analyses, the CAISO previously responded that this analysis would continue to evolve, as the storage charging estimates were informational only, considered preliminary, and would be refined in subsequent studies. From the discussion during the April 12th stakeholder meeting, it became apparent that the CAISO considers the assessment of approximate storage sizes that can be added to the LCR areas and sub-areas from charging restrictions purposes to be final for this transmission planning cycle.	Thank you for your comments.

[1] BAMx consists of City of Palo Alto Utilities and City of Santa Clara, Silicon Valley Power.

No	Comment Submitted	CAISO Response
	BAMx notes that stakeholders continue to be unclear about the determination of storage sizes that can be added in the LCR areas and sub-areas, with amounts varying from one year to another. This creates uncertainty about how this data could be used to appropriately procure and site battery storage. For example, the maximum 4-hour battery storage in the San Jose sub-area was reduced from 300MW in 2024 to 75MW in 2028. Based on the discussion during the April 12th call, it appears that the amount of storage was reduced based on reductions in the LCR needs due to planned transmission upgrades, rather than based on the amount of local storage that can be charged following contingencies.[2] To help market participants better understand the drivers of the changing local storage determinations, CAISO should provide the underlying calculations used to obtain these values as well as any work products, including spreadsheets used to calculate the charging capacity values for all the LCR areas and sub-areas. This information is important for informing procurement decisions, and BAMx strongly urges the CAISO to make it available, along with the Final LCR Report expected on May 1, 2023.	The maximum 4-hour battery storage is not an actual physical limitation, it represents the maximum 1-for-1 replacement of existing resources in that local area or sub-area with a 4-hour energy storage device. Section 2.4 of the LCR report includes the assumptions used to derive the battery storage estimates. The second assumption specifies that "storage added replaces existing generation MW for MW" and therefore the LCR need plays a major role in these estimates. In other words if there is no LCR need there is no LCR replacement needed and the LCR replacement may not exceed the LCR need. The CAISO cannot make the excel sheets with the underlying calculations available to third parties partly because they require engineering expertise and manual adjustments to calibrate for different types of local needs and different types of available local resources. The CAISO believes that the materials provided previously with detailed methodology and approach sufficiently explain the process of estimating amount of energy storage that can be added to a local area from the charging restriction perspective.

[2] CAISO 2024 & 2028 Final LCR Study Results, Greater Bay Area, Stakeholder Call, April 12, 2023, Slide 12

No	Comment Submitted	CAISO Response
2	**Southern California Edison (SCE)** **Submitted by: Allison Auld-Hill**	
2a	**Please provide your organization's overall comments on the 2024 and 2028 Local Capacity Requirements Technical Study Final Results.** SCE continues to encourage CAISO to provide the specific hourly needs behind the graphs that are included in the reports to allow modeling of the dispatch of resources to meet local reliability needs.	The CAISO is concerned that listing a specific energy requirement in MWh (or specific hourly needs) could be misunderstood as a change in policy, since currently energy (MWhs) are not enforced at the LSE level.

No	Comment Submitted	CAISO Response
3	**Vistra Corp.** **Submitted by: Cathleen Colbert**	
3a	**Please provide your organization's overall comments on the 2024 and 2028 Local Capacity Requirements Technical Study Final Results.** Vistra is a leading Fortune 500 integrated retail electricity and power generation company based in Irving, Texas, providing essential resources for customers, commerce, and communities. Vistra combines an innovative, customer-centric approach to retail with safe, reliable, diverse, and efficient power generation. Vistra is guided by four core principles: we do business the right way, we work as a team, we compete to win, and we care about our stakeholders, including our customers, our communities where we work and live, our employees, and our investors. Vistra brings these principles to its activities in California including through its commitment to and efforts to support the clean energy transition, primarily to bring new stand-alone storage online as renewable integration or load shifting is currently the main service needed to support grid reliability as indicated by the CAISO energy clearing prices. Through its subsidiaries, Vistra operates the Moss Landing Energy Storage Facility (400 MW / 1,600 MWh) and the natural gas-fired Moss Landing Power Plant (1,130 MW), which provide Resource Adequacy capacity and energy and ancillary service ("E&AS") products to the grid. By 2023, Vistra will increase its storage operations to 750 MW / 3,000 MWh. Vistra has plans to develop up to an additional 1,460 MW / 5,840 MWh of combined storage projects in California at its Oakland, Moss Landing, and Morro Bay sites to provide Resource Adequacy ("RA") capacity and E&AS products to enhance the reliability of the California grid. Vistra is committed to its plan to retire its jet fuel-fired Oakland Power Plant (110 MW) and replace it with storage to support local needs. Vistra is pursuing our storage development plans because we believe they are in the best interest of the state of California, including our plans to retire the Oakland Power Plant jet-fuel fired power plant. Further, we also believe our storage development is in the best interest of CAISO reliability. The storage development is "required" to complete the Oakland Clean Energy Initiative (OCEI) project approved in 2017-2018 Transmission Plan. Our efforts to retire the legacy RMR units at Oakland and replace them with energy storage consistent with the CAISO transmission plan have been	The Oakland Clean Energy Initiative (OCEI) project has two components: a transmission component and a new clean market resource component. The finalization of the transmission component greatly improves the local reliability situation in Oakland however that is not enough to facilitate the retirement of the entire Oakland Power Plant. As CAISO specified many times before the new clean market resource component is required in order to facilitate the existing plant's retirement.

No	Comment Submitted	CAISO Response
	hindered by the CAISO local capacity report, which does not identify any need associated with the retirement of legacy units for new resources in Oakland sub-area, in fact it is not identifying any sub-area requirement. Consequently, Pacific Gas & Electric Central Procurement Entity appears to have no requirement to procure a minimum amount of RA within the local sub-area. This results in an Oakland area resource being evaluated against resources within the Greater Bay area, instead of its sub-area. This makes it unlikely that a new resource, even a repowered resource, will be competitive within the Greater Bay area to facilitate an agreement to allow us to transition the generation at the Oakland jet-fuel powered aging asset to a reliable, emission-neutral asset.	There are no existing federal/state/environmental requirements that have specific deadlines for the existing Oakland Power Plant to retire. The CAISO agrees with Vistra that due to age the existing Power Plant should be allowed to retire and has facilitated this trough the approval of the OCEI project, however in order to accomplish this task the new clean market resources, part of the OCEI project, needs to be operational.
	Our understanding is that CAISO's intent is that there should be local requirements for the Oakland sub-area that require a minimum amount of capacity and energy to meet the local reliability needs assuming the Oakland Power Plant RMR unit is retired. It is critical the CAISO find a way to clarify whether the storage in the Oakland Clean Energy Initiative is required or not. If the CAISO is no longer identifying a minimum storage need in the Oakland sub-area, as this report appears to suggest, then the CAISO should begin planning for a transmission solution without storage element from OCEI. Based on the draft 2022-2023 TPP clarifications and statements regarding Oakland, Vistra understands the storage elements are still expected. If so, then Oakland does have a minimum sub-area local requirement of at least 44 MW (173 MWh across a four-hour RA resource).[3] In short, there seems to be a disconnect between the local capacity report, and CAISO's goals identified in its most recent Transmission Planning Process.	The Oakland sub-area capacity requirements are clearly described under the "Oakland LCR Sub-area Requirement" section of both the 2024 and the 2028 LCR report(s). In the draft report, the Oakland sub-area does not have a chart for the amount of energy storage that can be added to this local area from charging restriction perspective since there are no "non-battery" resources for replacement. In other words the Oakland #2 (55 MW battery) assumed to be in-service in 2024 (per data available in the CAISO's repower process at that time) is enough to meet the needs. CAISO has been made aware late in the LCR study process that the Oakland #2 battery will not be in-service in 2024. The CAISO will provide the chart in the final report for year 2024 based on the new information.
	Vistra requests the CAISO confirm in the 2024 LCR report whether storage is needed to meet an Oakland sub-area requirement, or not. If the CAISO continues to rely on Oakland storage, rather than propose a wires-only solution to the local need, then the CAISO should update the LCR results filed with the	CAISO still expects that the new clean market resources part of the OCEI project will be in-service at some point in the near future in order to facilitate the retirement of the existing Oakland Power plant.

[3] 2022-2023 Transmission Plan DRAFT, California ISO, April 3, 2023, page 168, http://www.caiso.com/InitiativeDocuments/Draft-2022-2023-Transmission-Plan.pdf. CAISO states, "The reliability planning for the Oakland 115 kV system anticipating the retirement of local generation is advancing mitigations that include in-station transmission upgrades, an in-front-of-the-meter energy storage project and load-modifying preferred resources. These resources are being pursued through the PG&E "Oakland Clean Energy Initiative" approved in the 2017-2018 Transmission Plan. Based on the development in the procurement activities, the location of the entire 36 MW and 173 MWh storage need has been moved to Oakland C substation in the 2021-2022 TPP. This continues to satisfy the local area need in absence of the local thermal generation. The approved project is expected to be in-service in 2024".

No	Comment Submitted	CAISO Response
	CPUC on April 6, 2023 to show a local need in Oakland for 44 MW of 4-hour RA resource or 35 MW of 5-hour resource. Lack of clarity on this issue could be viewed as an affirmative decision that the storage element of Oakland Clean Energy Initiative is no longer active element under the approved 2017-2018 project. Vistra requests the CAISO clarify if it expects both the Oakland Clean Energy Initiative transmission upgrades and the corresponding storage facility to be in-service in 2024, or only the transmission upgrades. There should be no expectation for storage at the Oakland C substation in 2024. Vistra believes it would be inaccurate to assume any storage in-service until an agreement is executed, which could be at the earliest in Q3 or Q4 2023 at the conclusion of PG&E CPE 2023 solicitation process. However, agreement by end of 2023 is becoming increasingly unlikely because the CAISO has chosen not to set an Oakland sub-area requirement. We understand CAISO is not setting an Oakland sub-area requirement because the local area requirement range identified through 2028 can be met by the existing 110 MW of the Oakland Power Plant. We should not expect PG&E to procure a new resource in this area if CAISO does not identify a requirement for such new resource. Vistra cautions the CAISO and others against delaying addressing the need to retire and replace the Oakland Power Plant. Ideally, the California Public Utility Commission's local capacity requirements informed by CAISO's report would result in multi-year forward requirements that allow developers to bring non-conventional preferred resources online with more certainty.[4] We need certainty that the new resource we are developing will meet not only the minimum capacity but also minimum energy requirements in the local area, and there will be the necessary incentives to procure new resources to address forward needs. Without adding the minimum energy requirement, Vistra and other developers will be forced to manage the uncertainty of whether they are developing the right size of new resource to meet the local need. Without allowing local RA requirements in forward years (2025 or 2026) to be met by new resources, we are concerned	CAISO market resources are needed in order to meet the Oakland sub-area requirement. New clean market resources are needed in order to facilitate the retirement of the existing Oakland Power Plant. CAISO relies on the owner of the assets (transmission or resources) to provide the accurate and most up-to-date in-service dates for their projects. Changes to in-service dates do occur and usually they do trigger changes in the local area needs. See above the CAISO response to the need comment for both capacity and chart. The CAISO reminds Vistra that per the existing RMR contract must do everything in its power to maintain the existing Oakland Power Plant in good working conditions until a suitable replacement is in-service and CAISO approves its retirement.

[4] Vistra filed a motion for leave to late-file comments on CAISO draft 2024 Local Capacity Technical Report, April 20, 2023 and filed comments that were served on parties to the Resource Adequacy proceeding on April 20, 2023.

No	Comment Submitted	CAISO Response
	there will continue to be a lag in curing the local areas that have deficiencies. It is important that Vistra and other developers have certainty that we are developing the right size of new resources and that there is a mechanism to value local development to allow us to cure any sub-areas deficiencies.	

No	Comment Submitted	CAISO Response
4	**California Community Choice Association (Cal-CCA)** **Submitted by: Evelyn Kahl, Lauren Carr, Eric Little**	
4a	**Summary of Comments.** The California Independent System Operator Corporation and the California Public Utilities Commission are taking important steps to reduce reliance on carbon-emitting resources in local areas. The California Community Choice Association encourages the continued study of the ability to reduce reliance on fossil fuel resources in local areas as soon as possible to ensure an orderly and reliable transition from reliance on fossil fuels in local areas at least cost.	Thank you for your support and comments.
4b	**California Community Choice Association's comments on e-mail ruling on comment schedule for local capacity requirement report and flexible capacity requirement report.** California Community Choice Association[5] (CalCCA) submits these Comments in response to the E-Mail Ruling on Comment Schedule For Local Capacity Requirement Report and Flexible Capacity Requirement Report,[6] dated April 10, 2023, and comments on California Independent System Operator Corporation Draft 2024 Local Capacity Technical Report, dated April 6, 2023.[7] **I. Introduction** The CalCCA appreciates the opportunity to comment on the California Independent System Operator's (CAISO) Draft 2024 Local Capacity Requirements (LCR) Report (Draft Report). The Draft Report highlights the importance of studying local capacity areas in a manner that ensures reliable operations under a zero-carbon grid as the state transitions away from its reliance on fossil fuel resources in local capacity areas. CalCCA encourages	Thank you for your comments.

[5] California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert Community Energy, East Bay Community Energy, Energy For Palmdale's Independent Choice, Lancaster Choice Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy: https://cal-cca.org/.

[6] E-Mail Ruling On Comment Schedule For Local Capacity Requirement Report and Flexible Capacity Requirement Report, R.21-1-002 (Apr. 10, 2023) (Ruling): https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M506/K170/506170385.PDF.

[7] California Independent System Operator Corporation Draft 2024 Local Capacity Technical Report, R.21-10-002j (Apr. 6, 2023) (Draft Report): https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M505/K462/505462894.PDF.

No	Comment Submitted	CAISO Response
	the continued study of the ability to reduce reliance on fossil fuel resources in local areas as soon as possible to ensure an orderly and reliable transition from reliance on fossil fuels in local areas at least cost. **II. The CAISO and the Commission are taking important steps to reduce reliance on carbon-emitting resources in local areas** In the California Public Utilities Commission's (Commission) Integrated Resource Planning (IRP) proceeding (R.20-05-003), CalCCA and other parties recommended that the Commission, in coordination with the CAISO, begin explicitly studying the ability to reliably serve load in local areas and disadvantaged communities with reduced reliance on fossil fuel resources. Specifically, CalCCA requested that the next sensitivity portfolios transmitted from the Commission to the CAISO for study in the Transmission Planning Process (TPP) should contemplate the retirement of fossil fuel resources in the local areas.[8] In response to these requests and to the direction in Senate Bill 887,[9] which requires the Commission to look at ways to reduce reliance on non-preferred resources in local areas, the Commission states in its D.23-02-040: "The importance of planning for additional natural gas plant retirements has been a priority for us for some time and Commission staff have begun work to develop this type of analysis. The analysis is complex, and we commit to beginning a process for stakeholder input on it in 2023. If it is ready, we will include it in consideration for a sensitivity analysis in the next TPP cycle.[10]" The Draft Report highlights the importance of conducting this assessment as soon as possible. The ability to retire fossil fuel resources in local areas will depend on either (1) eliminating transmission constraints that limit the number of resources capable of serving load in the local area, or (2) bringing online enough effective carbon-free resources inside of the local area to replace the	

[8] California Community Choice Association's Reply Comments on Administrative Law Judge's Ruling Seeking Comments on Electricity Resource Portfolios For 2023-2024 Transmission Planning Process, Rulemaking (R.) 20-05-003 (Nov.10, 2022), at 3: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M498/K526/498526150.PDF.
[9] Senate Bill No. 887 Consumer affairs: https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202320240SB887.
[10] Decision (D.) 23-02-040, Decision Ordering Supplemental Mid-Term Reliability Procurement (2026-2027) and Transmitting Electric Resource Portfolios to California Independent System Operator for 2023-2024 Transmission Planning Process, R.20-05-003 (Feb. 23, 2023), at 78: https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M502/K956/502956567.PDF.

No	Comment Submitted	CAISO Response
	existing fossil fuel resources. The Draft Report shows that new transmission can significantly reduce local area requirements - requirements in the LA basin dropped by over 40 percent, from 7,529 megawatts (MW) in 2023 to 4,413 MW in 2024, due to new transmission.[11] These results demonstrate that when cost-effective, new transmission can be extremely effective at reducing reliance on carbon-emitting resources inside the local area by increasing the ability to import clean resources outside the local area to load centers. Additionally, the CAISO indicates that it considered the ability of projects recommended in its 2022-2023 Draft Transmission Plan to reduce local capacity requirements and found that "there are 12 projects recommended for approval as reliability-driven and policy-driven that will increase the transmission capability into local areas."[12] Because local areas depend heavily on gas-fired resources, it will be critical for the CAISO and the Commission to identify when transmission can cost-effectively reduce LCRs to meet state policy goals. The CAISO and the Commission are on the right track and CalCCA encourages the continued study of the ability to reduce reliance on fossil fuel resources in local areas as soon as possible to ensure an orderly and reliable transition from reliance on fossil fuels in local areas at least cost. **III. Conclusion** For all the foregoing reasons, CalCCA respectfully requests consideration of the comments herein.	Thank you for your support.

[11] Draft Report at 2 and 4: http://www.caiso.com/InitiativeDocuments/Draft-2024-Local-Capacity-Technical-Report.pdf.
[12] Draft CAISO 2022-2023 Transmission Plan (Apr. 3, 2023), at 102: http://www.caiso.com/InitiativeDocuments/Draft-2022-2023-Transmission-Plan.pdf.

No	Comment Submitted	CAISO Response
5	**The Green Power Institute** **Submitted by: Gregory Morris**	
5a	**Comments of the Green Power Institute on the draft CAISO 2024 LCR report.** Pursuant to the April 6, 2023, California Independent System Operator Corporation Draft 2024 Local Capacity Technical Report, in Rulemaking no. R.21-10-002, the Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Reforms and Refinements, and Establish Forward Resource Adequacy Procurement Obligations, the Green Power Institute (GPI), a program of the Pacific Institute for Studies in Development, Environment, and Security, provides these Comments of the Green Power Institute on the Draft CAISO 2024 LCR Report. The Draft CAISO 2024 LCR Report is a highly technical document that employs a well-established approach to the determination of LCR capacity needs for California's constrained load centers. The GPI generally endorses the draft report. We offer limited comments about the study's treatment of storage charging sufficiency in determining an LCR's maximum effective storage carrying capacity. We commend the study for attempting to determine the maximum capacity each LCR and subarea has with which to support battery charging in each capacity-constrained area that can be used to discharge during periods when available generation capacity is unable to fully serve demand. However, we are concerned that the study appears to apply one hundred percent of the locally supportable storage capacity towards the LCR requirements of the study area. The problem is that if the full supportable storage capacity of a particular area is fully built out and there is a fault that limits the amount of generation that is available in the area, the deficiency will be magnified because in addition to the loss of generating capacity, the expected storage infrastructure output will also be unable to operate at full capacity because of the deficiency in available charging generation. The GPI recommends that the CAISO determine what a sufficient margin of safety would be between the calculated maximum supportable storage capacity in an area and the maximum storage capacity that can be counted towards the	Thank you for your comments. In future cycles please provide them directly into the CAISO process. This will allow for a more direct and meaningful impact to the actual LCR study results. The LCR studies are conducted under the jurisdiction of the CAISO Tariff and as described in section 40.3.1.1 the LCR studies must meet the existing reliability standards (NERC, WECC and CAISO). Changes to the LCR criteria requires a CAISO stakeholder process, CAISO Board and FERC approval. When coming up with the maximum battery storage that can be charged in local areas the CAISO methodology already considers the most stringent contingency in that local area and sub-area (more often than not either a double line outage N-2 or a line and the worst generator outage G-1L-1). True, currently there is no margin on top of the worst contingency. If such margin would be established, should it be included in the storage calculation only? Why such margin should not be included to increase the need for all other types of resources required in the local areas and sub-areas?

No	Comment Submitted	CAISO Response
	area's LCR requirement that would at least partially decouple this magnification effect in the event of the occurrence of the referenced fault factor. This margin-of-safety factor should then be applied to each LCR and subarea in determining how much storage capacity can be credited toward the area's LCR needs. **Conclusion** The draft 2024 LCR report does a good job of determining what the maximum carrying capacity is in each constrained area for storage resources, but in our opinion it errs in allowing 100 percent of the calculated maximum storage carrying capacity to count towards an LCR's local RA requirement. Letting an LCR build out its storage capacity to its full storage carrying capacity would allow unexpected shortfalls in energy supply to be magnified by also reducing the amount of storage energy that can be fed into the grid. We don't know what the correct margin of safety is that would mitigate this effect, but it is a factor that in our opinion the CAISO ought to spend some time and effort in determining. We urge the Commission and the CAISO to adopt our recommendations herein.	As explained in CAISO stakeholder calls, the battery charging results do not establish what resources can and cannot count for local RA. All resources (including storage) located in each local area, as long as they are deliverable to the aggregate of load, are allowed to count towards local RA requirements with the QC values established by each Local Regulatory Agency (such as the CPUC). The maximum battery capacity that can be charged from the grid in local areas and sub-areas under emergency conditions represents an informational item that was intended to guide the LSEs and the LRAs (CPUC most of all) in their quest to contract with, or locate, new battery storage devices and how these mash with planned transmission and other resource types in the same local areas and sub-areas. New batteries located in local areas beyond the maximum charging limit, still get to count towards RA and local RA, however they will not reduce the need for other technology types of local area resources.

No	Comment Submitted	CAISO Response
6	**Vistra Corp.** **Submitted by: Cathleen Colbert**	
6a	**Vistra Corp. comments on California Independent System Operator Corporation draft 2024 Local Capacity Technical.** Vistra Corp. ("Vistra") hereby provides its comments on the California Independent System Operator ("CAISO") Draft 2024 Local Capacity Technical Report ("Report"). The comments are submitted timely in accordance with Administrative Law Judge Chiv's Email Ruling issued on April 6, 2023 that established the deadline for comments of April 19, 2023.[13] Vistra is a leading, Fortune 275 integrated retail electricity and power generation company based in Irving, Texas, providing essential resources for customers, commerce, and communities. In California, Vistra owns and operates 1,130 MW of generation and 400 MW / 1,600 MWh of energy storage and provides natural gas retail products to California consumers. By 2023, Vistra will increase its storage operations to 750 MW / 3,000 MWh. Vistra has plans to develop up to an additional 1,460 MW / 5,840 MWh of combined storage projects in California at its Oakland, Moss Landing, and Morro Bay sites to provide Resource Adequacy ("RA") capacity and energy and ancillary services to enhance the reliability of the California grid as well as to allow it to retire its jet fuel-fired Oakland Power Plant and replace it with storage to support local needs. Through its subsidiaries, Vistra operates the Moss Landing Energy Storage Facility and the natural gas-fired Moss Landing Power Plant, which provide Resource Adequacy capacity and energy and ancillary service products to the grid. Vistra also operates the jet fuel-fired Oakland Power Plant, the full capacity of which is subject to a Reliability Must Run Agreement with the California Independent System Operator. As a seller of Resource Adequacy to California, Vistra is directly impacted by any enhancements to the California RA program. **I. Background** President Alice Reynolds' as the Assigned Commissioner's Amended Scoping Memo and Ruling ("Scoping Ruling") of September 2, 2022, established the scope of rulemaking 21-10-002 to cover various issues within Phase 3 of the	Thank you for your comments.

[13] A motion for leave to late-file has been filed concurrently with these comments.

No	Comment Submitted	CAISO Response
	Implementation Track including 2024-2026 Local Capacity Requirements (LCR). Vistra submitted proposals on the 2024-2026 Local Capacity Requirements being considered by the Commission (Scoping Ruling Issue #1).[14] Vistra filed clarifications on its Phase 3 proposals in our comments on Implementation Track Phase 3 proposals.[15] Vistra incorporates by reference and reasserts its prior comments filed here. Vistra filed proposals for the Commission to adopt multi-year local capacity requirements ("LCRs") beginning 2024 RA Year that (1) limit local reliability requirements reductions in areas with resources deficiencies to the binding RA year and allow CPEs and San Diego Gas & Electric to cure deficiency in forward years and (2) require local reliability requirements for both capacity and energy.[16] The CAISO raised on the February 8, 2023 workshop call that it has discretion on how to produce the Report. In response, Vistra clarified on February 24, 2023 that while we understand that the CAISO technical study methods are under CAISO's discretion, Vistra's proposals focus on how the Commission should use this report to inform its establishment of multi-year forward local RA requirements. **II. Comments** We believe it is the Commission's authority to propose multi-year local Resource Adequacy requirements as informed by the Report. The Commission should not be restricted to the precise values contained in the document but instead informed by them. We urge the Commission to use its authority to propose requirements that meet the state's goals. The multi-year forward requirements should allow developers bringing non-conventional preferred resources online either as greenfield or brownfield development to have more certainty that the new resources they are developing will meet not only the minimum capacity but also minimum energy requirements in the local area. Without adding the minimum energy requirement, developers	CAISO reminds the Commission that "deficiencies" are calculated to give stakeholders a view as to where new future resources may be better located, however it is not advisable that the deficiency part be included in the actual requirement until such future new resources are on their path of becoming operational themselves.

[14] See Vistra Corp. Implementation Track Phase 3 proposals, Section I, https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M501/K442/501442069.PDF.
[15] See Vistra Corp. Comments on Resource Adequacy Implementation Track Phase 3 proposals, February 24, 2023, Section II, https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M502/K756/502756666.PDF.
[16] See Vistra Corp. Implementation Track Phase 3 proposals, January 20, 2023, Section II, https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M501/K442/501442069.PDF.

No	Comment Submitted	CAISO Response
	will face uncertainty regarding whether they are developing the right sized new resource to meet the need. Without including some portion of a local RA requirement that can be met by new resources with the ability to achieve commercial operations, Vistra is concerned there will continue to be a lag in curing the local areas that have deficiencies without the clarity that this obligation to cure exists.	Secondary many of these "deficiencies" are actually better resolved by transmission upgrades rather than new resources.
	The Commission should use its authority and propose 2024-2026 requirements that appropriately identify the needs of the CPUC jurisdictional entities local RA obligations to meet the capacity and energy needs of our evolving grid and to ensure timeliness in addressing any deficiencies in meeting these needs. For example, the Proposed Decision should produce local requirements for the Oakland area that requires a minimum amount of capacity and energy to meet the local reliability needs assuming the Oakland Power Plant RMR unit is retired. The Commission's own record should support a requirement for this area. We believe other areas may similarly need more logical requirements and urge the Commission to identify requirements that better meet the state's needs. Similarly, the Commission should establish procurement targets for 2025 and 2026 forward requirements to cure 2024 deficiencies. Specifically, the 2025 and 2026 requirements should not be fully reduced if there are planned projects that have executed interconnection agreements with full capacity deliverability statues or that have received a Transmission Plan Deliverability allocation that afford full capacity deliverability rights progressing towards executed interconnection agreements. To the extent the Commission needs additional information from CAISO to implement this suggestion, we urge the Commission to seek that information before establishing procurement targets. **III. Conclusion** Vistra appreciates the opportunity to submit these comments on CAISO's Draft 2024 Local Capacity Technical Report. For the reasons explained above, Vistra requests the Commission propose local requirements that are informed by this report but not limited to it so that the state's goals can be achieved with more certainty and less delay.	The CAISO supports Vistra's proposal. It falls under the Commission jurisdiction to approve contracts with new clean market resources in order to fulfill the existing need approved under the Oakland Clean Energy Initiative (OCEI) project to facilitate orderly retirement of the existing Oakland Power Plant.