California ISO

Stakeholder Comments Template
Hybrid Resources Initiative: Straw Proposal

This template has been created for submission of stakeholder comments on the **Hybrid Resources Initiative, Revised Straw Proposal** that was held on December 17, 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/HybridResources.aspx

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on January 14, 2019**.**

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Please provide your organization's comments on the following topics and indicate your orginzation'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 as applicable.

The Large-scale Solar Association (LSA), EDF-Renewables (EDF-R), and Intersect Power (together, the Developers) welcome the opportunity to submit these joint comments on the Revised Straw Proposal (RSP). The Proposal includes several distinct improvements over the earlier Straw Proposal (SP), and the Developers appreciates the CAISO's willingness to consider such modifications.

The Developers's comments focus mainly on Hybrid Resources (HRs) with Solar and Storage Components. These comments address several areas, focusing particular discussion in two areas:

(1) **The proposed Net-to-Grid (NTG) Forecast, and the related issue of Variable Energy Resource (VER) Component treatment.** In particular, the Developers suggest a market/operations alternative that would allow VER-storage HRs to retain some VER treatment while not forcing Scheduling Coordinators (SCs) to forecast market outcomes that are simply not knowable in advance.

(2) **HR Resource Adequacy (RA) Qualifying Capacity (QC)**, especially in light of the CPUC's recently issued Proposed Decision (PD) and the CAISO's proposed adoption of that methodology as the default HR QC methodology in its own tariff.

1. Terms and Defintions
Please provide your organization's feedback on the proposed terminology and defintions as described in the revised straw proposal.

The Developers support most of CAISO's proposed new definitions but are concerned about the revised Hybrid Resource definition. The RSP defines a Hybrid Resource as (emphasis added):

> A resource type comprised of a mixed-fuel type project, or a combination of multiple different **generation** technologies that are physically and electronically controlled by a **single owner/operator** and Scheduling Coordinator behind a single point of interconnection (POI) that participates in the CAISO markets as a single resourcewith a single market resource ID.

The Developers have two comments on this definition:

- **"Generation" technologies:** Since both generation and storage will be included in many or most HRs, the Developers suggests the clarifying phrase "generation **and/or storage**."
- **"Single owner/operator" requirement:** This requirement was the subject of considerable confusion in the discussion at the recent stakeholder meeting, in particular the definition of a "single owner/operator," which is not a defined term.

  The CAISO explained at the meeting that the requirement for a "single owner/operator" refers to a single Interconnection Customer, i.e., it does not disallow the current common Interconnection Customer composition of multiple entities, e.g., different LLCs that can own different phases of a project.

  To avoid this confusion, the Developers suggest that the CAISO simply use the term "Interconnection Customer" instead of owner/operator. This is a defined term that more accurately conveys the CAISO's intent.

In combination, the following revised HR definition would reflect the Developers' suggested changes:

> A resource type comprised of a mixed-fuel type project, or a combination of multiple different generation and/or energy storage technologies that are physically and electronically controlled by a single Interconnection Customer ~~owner/operator~~ and Scheduling Coordinator behind a single point of interconnection (POI) that participates in the CAISO markets as a single resourcewith a single market resource ID.

2. Forecasting
Please provide your organization's feedback on the forecasting topic as described in the straw proposal.

The Developers' comments on this topic address the following issues:

- Status of HR VER Components
- CAISO provision of HR VER output forecasts
- VER Component High Sustainable Limit (HSL)
- HR Net-to-Grid (NTG) Forecast

Status of HR VER Components

The Developers believe that VER Components should retain both their VER and Eligible Intermittent Resource (EIR) status, as well as their eligibility for the Participating Intermittent Resource Program (PIRP), for the reasons discussed below.

The statements on this issue in the RSP are confusing. The CAISO summarized its position as follows in the stakeholder meeting presentation:

- "Hybrid resources are not considered VER or EIR resources." (Slide 18)
- "Although CAISO will not consider hybrid resources to be eligible for EIR or PIR treatment, the VER components may retain their VER status. (Slide 22)
- All HR configurations in the chart on Slide 39 are shown as VERs ("Yes" in that column) but without "VER Treatment" ("No" in that column.) "VER treatment" is shown separately in that chart from EIR or PIR eligibility but not explained there.

Based on stakeholder meeting discussions, and the statement on Slide 18 that "Any hybrid resource combining non-VER generation with VER generation is not eligible to be an EIR or PIR," "VER treatment" appears to mean the same thing as Eligible Intermittent Resource (EIR) status and/or Participating Intermittent Resource (PIR) eligibility. In other words, the CAISO position appears to be that:

- **VER Components of HRs can still qualify as VERs** (i.e., that the "Yes" under "VERs" on Slide 39 is only intended to apply to VER Components and not HRs more broadly); but
- **VER Components of HRs cannot qualify as EIRs or participate in the PIRP**, despite retaining their VER status.

The CAISO cites the definitions below in support of its position (Slide 18).

- **FERC Order No. 764 (FERC Order) VER definition** (emphasis added):

  A **device** for the production of electricity that is characterized by an energy source that: (1) is renewable; (2) cannot be stored by the facility owner or operator; and (3) has variability that is beyond the control of the facility owner or operator.

- **CAISO tariff Appendix A EIR definition**:

  A [VER] that is a Generating Unit or Dynamic System Resource subject to a Participating Generator Agreement, Net Scheduled PGA, Dynamic Scheduling Agreement for Scheduling Coordinators, or Pseudo-Tie Participating Generator Agreement.

With all due respect, these definitions do not support the CAISO's conclusion that the VER Component of an HR is not entitled to "VER treatment."

First, and most basic – and in case there is any doibt about the CAISO position in this regard – there is no basis for concluding that the VER Component of an HR: (1) Is not a VER; and/or (2) even though it is a VER, it should not be entitled to "VER treatment." This seems inconsistent with both the clear language in the FERC Order and the CAISO's own tariff.

The FERC Order does not require that applicable generation capacity be in any particular Resource ID configuration to be considered a VER. In fact, the Order only references the equipment ("device") and not any specific market or settlement construct. Thus, this language certainly does not imply that VER capacity loses its VER status simply by being grouped with storage or other capacity into one Resource ID. The VER Component still meets the definition by being: (1) Renewable; (2) unable to store energy; and (3) subject to variability that it cannot control.

Second, assuming that the VER Component of an HR remains a VER (as some of the CAISO's presentation states), there is no basis for assuming that a VER does not qualify for "VER treatment." The CAISO tariff definition quoted above does not disqualify that capacity from EIR status – it simply requires that the VER be: (1) a Generating Unit; and (2) subject to a Participating Generator Agreement (PGA) or similar CAISO market-participation agreement.

Generating Unit is defined in CAISO Tariff Appendix A as follows:

> An individual electric generator and its associated plant and apparatus whose electrical output is capable of being separately identified and metered…that… is: (a) located within the CAISO Balancing Authority Area…; (b) connected to the CAISO Controlled Grid, either directly or via interconnected transmission, or distribution facilities…; and (c) capable of producing and delivering net Energy (Energy in excess of a generating station's internal power requirements).

The VER Component of a CAISO-area HR connected to the CAISO grid would definitely be:

- **"Capable of being separately identified and metered,"** since it can be clearly identified and is capable of being metered separately (not that it must be so, only "capable" of that);
- **"Subject to" a PGA**, together with the other associated HR Components (not that it must have its own separate agreement, only that it must be "subject to" such an agreement, which would be the case here); and
- **"Capable of producing and delivering net Energy"** (not that it always must deliver such net Energy immediately, or that the Energy could not be cycled through an associated storage device first, only that it be "capable of producing and delivering" Energy).

In other words, the VER Component capacity would qualify as a Generating Unit (in fact, the CAISO considers it as such for, e.g., TP Deliverability transfers), and there is no indication in the tariff or FERC decisions that being grouped with storage in a single Resource ID would somehow impair that status.

Thus, the Developers maintain that the VER Component – at least – of an HR would not only continue to be a VER, but should qualify for "VER treatment," i.e., retain EIR status and, therefore, be eligible for PIRP. This is the basis for the Developers' "alternative proposal" below.

CAISO VER Forecast

The RSP reverses CAISO's earlier position that it would not provide forecasts for HR VER Components, stating that it will do so for resources that want it, before real time, "for a fee" (Slide 22). However, the CAISO will not submit the forecast into the market, as it does with PIRP; instead, the resource SC can incorporate that forecast as it wishes and submit the resulting NTG Forecast (see below).

LSA's and EDF-R's earlier comments supported CAISO provision of a VER forecast, and the Developers are pleased that the CAISO has changed its position on this issue. Rhe Developers have two additional comments.

First, the "fee" charged for this service should not exceed the regular VER forecasting fee of $0.10/MWh.

Second, as explained above and below, while it would help to have the CAISO provide a forecast before real time, there was nothing to indicate that HR SCs would have access to the CAISO's real-time updates that CAISO itself uses for PIRP resources. The CAISO was very explicit in saying that it would neither submit HR NTG forecsts using the VER forecast nor adjust it in RT to account for VER forecast changes, but HR SCs won't then have the forecasting tools to adjust their NTG forecast itself.

At a minimum, the CAISO should continue to provide VER forecast updates into and throughout real time, for use by HR SCs. Given the short-interval RT timing, however, the Developers's Alternative Proposal below addresses this problem more efficiently.

VER Component "High Sustainable Limit" (HSL) ("Plant Potential" in Straw Proposal)

The RSP requires provision of an HSL data point, but CAISO has not provided a clear and coherent explanation of this term and how it plans to use the data, along with examples. Information provided thus far by the CAISO indicates that the HSL measure:

- Would reflect all installed VER capacity, even that above the maximum POI capacity (even though CAISO would have this information already in interconnection-related documents)
- Would reflect all available installed VER capacity (even though CAISO would have this information already from required outage reporting)
- Would reflect available fuel (wind or insolation) (even though CAISO would have this information already from RT met-data telemetry)
- Could perhaps, for solar generators, be measured through installation of "some kind of device" to measure "electrons" hitting solar panels but not generating electricity (but it's not clear what kind of device CAISO has in mind or how the data would be created or provided to CAISO)
- Would somehow provide information about VER capability to generate and inject into both on-site storage and the CAISO Grid (though it's not clear just what the CAISO will do with this information, in markets, operations, or other contexts).

The Developers are still puzzled by what the CAISO needs here and why. The CAISO should better explain, with examples:

(1) The nature (substance and granularity) of the data it wants;

(2) How it expects HRs with VER Components to gather, process, and provide these data; and

(3) How it plans to use this information.

CAISO said at the stakeholder meeting that other jurisdictions require and use this measure – perhaps the explanatory materials from those jurisdictions could be provided to help explain this proposed requirement.

Hybrid Resource Net-to-Grid (NTG) Forecast

The RSP describes the proposed ability of SCs for HRs with VER Components to submit this real-time forecast of HR capability to inject energy into the CAISO grid, considering any VER Component Forecast (from the CAISO or SC), expected storage component State of Charge (SOC), and anticipated storage component charging/discharging (from the grid or on-site generation). This functionality will not be available in CAISO markets until Fall 2021.

The NTG Forecast would constitute an "economic upper limit" (maximum MW value) to real-time HR market awards and dispatches, to help ensure that they are physically feasible. In this way, the forecast would function much like the VER forecast for resources in PIRP, which also functions as a RT economic upper limit to awards and dispatches. The NTG Forecast "should" be provided to CAISO "with 5-minute granularity for minimum of a rolling 3-hour forward basis."

However, there are two main differences between the NTG Forecast and the CAISO PIRP forecast:

- While the CAISO will provide a VER Component forecast before RT to those requesting it and paying a "fee" (see above), the NT Forecast is forecast would be provided by the HR SC and not the CAISO, because the CAISO cannot know "SC decisions related to on-site optimization and charging or discharging of underlying hybrid resource components."
- The NTG Forecast could be updated in RT every 5 minutes, like the CAISO RT forecast for PIRP – e.g., to reflect VER Component output changes, Storage Component market dispatches, and/or revised energy transfers between storage and non-storage components. However, the CAISO will not perform this update; instead, RT updates must be performed by the HR SC.

The Developers has two main concerns about the NTG Forecast.

First, it is unclear whether submission of an NTG Forecast is required for HRs with VER Components or simply a "beneficial" option for those electing to use it. For example, some HRs may not wish to limit RT market awards and dispatches to a level set in advance, incur the obligation to craft and submit such a limit, and/or wish to perform the frequent RT updates needed to implement this concept.

However, at the stakeholder meeting, WPTF raised an issue of "gaming" if the NTG Forecast is not required, and that comment led the CAISO to state that the NTG Forecast submission might be mandatory. Neither WPTF nor the CAISO explained why this concern might arise for HRs without an NTG Forecast; without such an explanation and thorough vetting, submittal of an NTG Forecast should be optional and not required.

Second, and more seriously, the Developers is concerned about the desirability and feasibility of this concept, for the following reasons:

- **VER Component forecast accuracy:** Most VERs are in PIRP, i.e., schedule and operate under a CAISO-provided forecast, based on consistent weather and other key assumptions. Even if the CAISO provides a VER Component to some HRs as proposed, there is no guarantee that the forecast will be used by the HR SC; more over, as noted above, the CAISO proposal does not mention any CAISO RT VER Component forecasts; without RT access to the kinds of VER forecast updates the CAISO uses itself for PIRP, RT NTG Forecast updates by HR SCs will potentially be based on disparate assumptions and methodologies that can adversely impact their accuracy.

- **Ability of HR SC to craft other key NTG Forecast elements:** As noted by stakeholders at the CAISO meeting, the NTG Forecast concept requires HRs submitting any economic bids to forecast in advance the results of those bids, i.e., to somehow anticipate market results – awards and dispatches – in advance.

  Certainly, individual resources are not in a position to perform such forecastsWhere the resource is submitting RT economic bids (including any RT bids for a storage component to charge from or discharge into the grid), the owner or SC would not know the RT market dispatch results in advance. Such a provision would discourage market bids in favor of more predictable self-schedules.

While the ability to frequently update the NTG Forecast in RT as often as every 5 minutes would help mitigate these problems, that would still be an extremely difficult and labor-intensive process, and the HR SC may not have the information and tools necessarily to accurately perform this task.

Alternative Proposal, Part 1: As noted above, the Developers believe that the CAISO should offer an option that would treat the VER Component as a VER (and the Storage Component as storage). Since the CAISO software changes for the NTG Forecast won't be implemented until late 2021, there should be time to incorporate additional changes to implement this concept.

To begin with, an HR electing this option would provide additional information in its RT NTG Forecast, i.e., separate output forecasts for the VER and Storage Components, and a third forecast for injection from the VER into storage. As described in Part 2 under Markets and Systems below, the CAISO – and not the HR SC – would adjust the NTG Forecast in RT.

3. Markets and Systems
Please provide your organization's feedback on the markets and systems topic as described in the revised straw proposal.

The Developers' comments in this section address the following topics:

- Proposed interim solution to the CAISO Master File "stranded capacity" problem for Co-located Resources
- Timing & use of NTG Forecast
- Part 2 of the Developers's Alternative Proposal for the NTG Forecast

Co-Located Resources Master File Problem (interim solution)

As noted before, the CAISO Master File (which contains all market-relevant resource parameters (e.g., Pmax (maximum output at the Point of Interconnection (POI)), ramp rate) "divides up" the overall project Pmax between Co-located Resources for such projects.

Thus, for example, Master File values for Co-located Resources with a combined 100 MW Pmax, with 100 MW of solar and 100 MW of storage, cannot total more than 100 MW. Instead, the solar and storage Resource IDs must share the 100 MW project Pmax – e.g., taking 50 MW each (split can be selected by the IC) – and then CAISO systems will treat each component like completely independent projects at the respective individual Resource ID Pmaxes, i.e., would never dispatch either above 50 MW (e.g., limiting storage dispatch to 50 MW even at night).

The CAISO proposes to implement a new "interconnection rights constraint" to enforce the overall project Pmax without stranding capacity from the co-located Resource IDs. It would adjust Energy and Ancillary Services market awards, schedules, and dispatches to injection limits in a new master file field that will tie the different Resource IDs to the overall project Pmax. However, this functionality cannot be implemented until Fall 2021.

The RSP offers an interim solution, implementable in Fall 2020, that would limit market awards and dispatches to the overall project Pmax, without stranding capacity for either Co-located Resource. However, this interim functionality will be limited to energy bids/awards/dispatches only, i.e., projects electing to use this functionality will not be able to submit Ancillary Services bids in the interim period.

The Developers support the proposed interim solution and thank CAISO for changing its prior resistance to an energy-only solution. The Developers urge CAISO to continue its consideration of this issue to see if the Ancillary Services limitation can be removed before Fall 2021.

Timing & use of NTG Forecast

There was a confusing discussion at the stakeholder meeting about:

- When NTG Forecasts for each hour would be provided (e.g., would have to be after provision of CAISO RT VER Component forecast – see above); and
- How updated RT NTG Forecasts would be used, given RT market granularity (15/5 minutes).

As requested by stakeholders at the meeting, CAISO should issue examples showing these points, in an RSP Proposal supplement or the upcoming Second Revised Straw Proposal.

Alternative Proposal, Part 2

As noted in Part 1 under Forecasting above, An HR electing this option would provide a NTG forecast with separate "Component Forecasts" for the VER and Storage Components, and a third component for storage injections from on-site generation. The CAISO would then treat these two Forecast Components separately in real time, adjusting them as appropriate. Specifically, in RT, the CAISO would treat the on-site injection portion of the forecast as fixed, and adjust the NTG Forecast to reflect RT changes:

- To the VER Component forecast, based on changes in its 5-minute VER forecasts;
- To the Storage Component forecast, based on RT market dispatches.

This functionality would provide more accurate NTG forecasts by avoiding the need for each HR project to compose and adjust its NTG forecast based on its own assumptions (which would be inconsistent from those of other project operators). It would also encourage submission of HR economic bids by avoiding the need to forecast market results in advance.

4. Ancillary Services

Please provide your organization's feedback on the ancillary services topic as described in the revised straw proposal.

The Developers have no comments at this time.

5. Metering and Telemetry

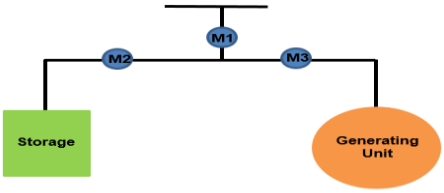
Please provide your organization's feedback on the metering and telemetry topic as described in the revised straw proposal.

The Developers' comments on this topic address metering and Renewables Portfolio Standard (RPS) reporting issues.

The RSP proposes that Co-located Resources, which have separate Resource IDs and thus separate reported meter reads, should be considered completely separate projects for RPS reporting purposes, so any storage round-trip losses need not be subtracted from production by collocated VER Resource IDs and injection/withdrawal of that energy into storage. (Hybrid Resources would still be subject to the CEC-required round-trip losses subtraction, though some suppliers have apparently discussed rule changes with the CEC on this topic.)

The RSP suggests the metering configuration below to accommodate this concept, with M1 netting for the entire project, M2 metering storage only, and M3 metering generation only. For each 5-minute interval:

- M3 reads would be used for CEC reporting
- M3 – M1, if positive, equals renewables injections into storage for ITC reporting purposes.
- M3 – M1, if negative, equals grid-based injections into storage for ITC reporting purposes
- M2 reads would measure injections into the grid



LSA and EDF-R earlier recommended an interpretation of CEC rules that would consider the separate Resource IDs of Co-Located Resources as entirely separate resources, to make treatment of the VER Resource ID more equitable and consistent with stand-alone VERs. The Developers thank the CAISO for its further consideration of this concept and its proposal that would enable its implementation.

That said, the Developers encourage the CAISO to provide additional scenarios and examples to illustrate the bidding and settlement issues with this construct. the Developers also questions the need for a third meter for this configuration, since it appears that the third measure needed to implement it would be mathematically derivable from the other two.

6. Resource Adequacy
Please provide your organization's position on the Resource Adequacy topic as described in the revised straw proposal.

The Developers' comments on this topic address:

- Resource Adequacy (RA) default Qualifying Capacity (QC) methodology
- Implementation of the HR QC methodology in a recent CPUC Proposed Decision (PD)
- QC limitations for Co-located Resources
- HR Must-Offer Obligations
- HR Flexible RA (Effective Flexible Capacity (EFC) value)

Default HR QC methodology

The Straw Proposal included a method would have calculated RA QC value for each HR Component based on the existing stand-alone CPUC methodology and added them together, subject to the total not exceeding the overall project interconnection rights.

However, since that CAISO proposal was issued, the CPUC issued the PD referenced above that would set HR QC at the higher of the QC for the different Components (and not the sum), on an interim basis. In the RSP, the CAISO now proposes to use this new method to determine CAISO tariff default QC value for HRs.

The Developers do not agree with the CAISO's proposed use of the PD method, for the following reasons.

- **The PD method is still only proposed**, i.e., may not be adopted as is in the final interim decision.
- **CAISO is not obligated to adopt the PD method** as the CAISO tariff default method if it believes that its last proposal (which was consistent with its proposal in the CPUC proceeding) was fair and reasonable. For example, use of the PD method for HRs could lead developers to avoid the HR configuration just to avoid an RA reduction, and not because it is the best one.

Implementation of the PD methodology (CAISO default method and/or CPUC adoption)

As CAISO pointed out at the stakeholder meeting, the HR Component with the higher QC could change from month to month (given the different monthly values for VERs), e.g., the VER Component QC could be higher in summer months when Technology Factors are high, and the Storage Component QC could be higher in months (e.g., winter) when TFs are low. This means that, logically, the CAISO should be prepared to:

- **Calculate QC each month using a different basis** (e.g., VER or storage); and

- **Address the impacts of this methodology together with recent activities related to deliverability transfers.** For example, many generation developers requested storage additions to VER resources, and/or deliverability transfers to those additions, based on the CAISO's recent opportunity to make those changes under the current Deliverability Assessment methodology. In these situations, it's unclear what would happen in months when the VER Component QC is larger and, therefore, would establish the HR QC.

There are two options to accommodate the monthly PD QC determination together with recent deliverability transfers in an equitable manner.

(1) **Allow monthly deliverability switches between HR Components.** This should be a default option, i.e., CAISO should assume that HRs will want to switch deliverability to the Component that will maximize the monthly RA value unless they explicitly opt out of that automatic change, to minimize administrative hassle for both the CAISO and HRs.

So, for example, where HRs have requested deliverability transfers to storage additions but the VER Component would set the QC value, the CAISO should automatically:

- Transfer the maximum deliverability amount back to the VER Component, up to the amount needed for VER FCDS status, to maximize the HR QC that month.
- Transfer that deliverability back to the Storage Component in months when storage sets the QC for the HR.

(2) **Calculate HR QC as though the deliverability transfers described above were made.** In other words, the CAISO could calculate the QC as though the HR Component that would have the higher QC has the maximum deliverability available for the resource overall, without requiring actual transfers of the deliverability. This is the administratively simpler option.

Co-Located Resource POI constraint

There was a discussion in the stakeholder meeting slides (Slides 80-82), and briefly at the meeting as it wound down, about how Co-Located Resource QCs would be set based on POI capacity limitations under the new Intertie Resource Constraint proposal, i.e., if the QCs for the separate Resource IDs exceeds the project maximum allowed output at the POI capacity.

The Developers strongly recommend that the CAISO:

- **Allow HR resources to set the QC splits themselves**, within the CAISO responsibility to determine NQC. The CPUC or other Local Regulatory Authority sets the QC, but it's up to the CAISO to determine how much of this QC is deliverable, i.e., the NQC value.

- **Allow this split to vary monthly to maximize overall project NQC** (which, for administrative convenience, could be offered as an automatic adjustment option). HRs may want the QC split to favor VER Resource IDs when VER monthly QCs are high, and to favor Storage Resource IDs in other months.

HR Must-Offer Obligations

The RSP would impose MOOs to reflect its revised default HR QC proposal, described above. The Proposal would set the MOO based on the resource driving the HR QC, as shown below.

HR COMPONENT DETERMINING QC	*DA MOO*	*RT MOO*
Storage	QC	DA award
VER	None	NTG Forecast

This framework makes sense, since only RA Resources have MOOs. For example, in months when the solar capacity is setting the HR QC, the project gets no RA credit for the storage capacity, so the RA obligations should only be those that would apply to the solar capacity.

HR Effective Flexible Capacity (EFC) value

The CAISO's proposals in this initiative have not addressed the issue of Flexible Capacity qualification for HRs – e.g., the EFC value that would be assigned to such resources, under either the current framework or the proposed framework under the RA Enhancements Initiative. The Developers request that the CAISO describe its position in the next iteration of its proposal in this initiative.

Additional comments

Please offer any other feedback your organization would like to provide on the Hybrid Resources Initiative.