

SCE Final Proposal comments – Hybrid Resources Aggregate Capability Constraint (HR ACC)

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Southern California Edison (SCE) provides the following comments on the California Independent System Operator (CAISO) Final Proposal¹ and Meeting on HR ACC held June 3, 2021.

SCE requests that the CAISO provide details on the proportion of resources, relative to the total fleet, that can benefit from such proposed changes, including the total MW impact of said resources. SCE also requests that the CAISO clarify on the ability of the CAISO to implement such changes, specifically whether the CAISO has sufficient assets to be able to achieve a successful implementation of the proposal.

Finally, SCE urges the CAISO to provide more clarity on its proposal. Including questions from other stakeholders,

1. How many revenue quality meters will be used for configurations such as the one on page 7 of the presentation?
2. How will multiple SCs interact with each other and the CAISO to effectuate such a proposal, assuming the page 7 configuration?
3. How will resource performance, outages and settlements (such as related to no-pay provisions) be addressed?
4. How will the CAISO issue dispatch instructions to Eligible Intermittent Resources (EIR) to manage the main ACC, that is, the master constraint? Will the SUPP² component of the dispatch instruction be leveraged? If so, would the EIR be requested not to exceed the Real Time VER (Variable Energy Resource) forecast continuously?
5. How will the CAISO manage the ACC when the resource is providing energy and ancillary services with the EIR in supply mode when the storage resource is in dispatch mode consistent with the graphic on p.7 of the presentation?
6. Can the CAISO confirm that there will be one Resource ID per ACC?
7. If the CAISO is allowing more than one Resource ID per ACC will each Resource ID be allowed to fully specify the technical characteristics of that specific resource?

¹ <https://stakeholdercenter.caiso.com/StakeholderInitiatives/Hybrid-resources>

² RT Supplemental Energy. Negative value if RT Dispatch Operating Target (DOT) < Forecast Value.