



Stakeholder Comments Template

RA Enhancements

This template has been created for submission of stakeholder comments on the RA Enhancements Issue Paper that was published on October 22, 2018. The Issue Paper, Stakeholder Meeting presentation, and other information related to this initiative may be found on the initiative webpage at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/ResourceAdequacyEnhancements.aspx>

Upon completion of this template, please submit it to initiativecomments@caiso.com.

Submitted by	Organization	Date Submitted
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Submissions are requested by close of business on **November 14, 2018**.

Please provide your organization's comments on the Issue Paper scope items listed below and any additional comments using this template.

Scoping Items

The ISO's has identified the following items for the initial scope of this stakeholder process. Please provide comments on each of the scoping items.

1. RA Counting and Eligibility Rules

a. System RA

The ISO proposes to review the RA counting and eligibility provisions related to RA resource NQC adjustments in this initiative, including a review of the application of Effective Forced Outage Rate (EFOR) performance criteria and accompanying NQC reductions and a review and clarification of RA counting rules for RA resources. Please provide comments on this scope.

Comments:

AWEA California offers no comments on this topic at this time.

b. Flexible RA

The ISO proposes to continue exploring enhanced flexible RA counting rules started in the FRACMOO2 stakeholder process. More specifically, the ISO will continue assessing the operational capabilities required from the fleet to align with both the Day-Ahead Market Enhancements (DAME) and the Extended Day Ahead Market (EDAM) and what flexible RA counting rule changes may be needed. Please provide comments on this scope.

Comments:

AWEA California supports the CAISO's continued efforts to explore enhanced flexible RA counting rules and flexible RA requirements. It is reasonable to evaluate flexible counting rules by starting with the discussions and proposals from FRACMOO 2. During FRACMOO 2, and within the Second Revised Framework Proposal in that initiative, the CAISO discussed how wind and solar economically bid into the day-ahead market can address the net load ramp at quantities that can far exceed the resource's Net Qualifying Capacity and proposed options that would allow the unbundling of Net Qualifying Capacity and Effective Qualifying Capacity. We strongly encourage the ISO to continue to explore options for wind and solar resources to provide flexible RA above the resource's Net Qualifying Capacity, based on the resources' contribution to the ISO's flexibility needs. Additionally, AWEA supports considering flexible RA counting rules in the context of the DAME and EDAM and what flexible RA counting rules may be needed to support these markets.

2. Review of Resource Adequacy Import Capability Provisions

The ISO proposes to conduct a comprehensive review of the ISO's Import Capability provisions, including; calculation methodologies, allocation process, and reassignment/trading provisions. The ISO believes that it may also be necessary to consider multi-year assessments and allocations. Please provide comments on this scope.

Comments:

AWEA California supports this review, which is especially important in light of the changing system conditions and market dynamics.

3. Rules for RA imports

The ISO proposes to include a review of RA import rules and provisions in the scope of this initiative, including a reassessment of the requirements and rules for the sources behind RA imports. Please provide comments on this scope.

Comments:

AWEA California looks forward to participating in discussions on this scope going forward.

4. Must Offer Obligations, Substitution Rules, and RAIM

The ISO proposes to include a review of the following set of issues as a part of this stakeholder initiative; need for substitution rules and RAIM, developing an

emergency or event based RAAIM trigger, and must offer obligations for RA imports. Please provide comments on this scope.

Comments:

AWEA California offers no comments on this topic at this time.

5. System and Flexible Capacity Assessments and Adequacy Tests

As part of this stakeholder initiative, the ISO is considering a new tool to assess the adequacy of the system and flexible RA fleet. Please provide comments on this scope.

Comments:

AWEA California strongly supports the ISO's evaluation of one or more new tools to assess the effectiveness of the portfolio of system and flexible RA resources to meet the overall operational needs of the ISO. While the CPUC is currently considering a multi-year RA framework only for local RA requirements, the ISO should consider methods for this proposed system/flexible RA effectiveness tool to be used on a multi-year basis. Multi-year system/flexibility assessments performed by the ISO may provide useful information to the ISO, the CPUC, Load Serving Entities, and RA resources. AWEA California looks forward to participating in these discussions and exploring the tools that are best suited for this purpose.

6. Meeting Local RA Needs

a. Local capacity assessments with availability limited resources

As part of this stakeholder initiative the ISO proposes to enhance the ISO's local capacity technical analysis to assess the impact of availability limited resources on local capacity needs. Please provide comments on this proposed scope.

Comments:

AWEA California offers no comments on this topic at this time.

b. Meeting local capacity needs with slow demand response

Through this initiative, the ISO proposes to explore how to best operationalize slow DR through pre-contingency dispatch so these resources can mitigate local reliability concerns and qualify for local RA. Please provide comments on this scope.

Comments:

AWEA California offers no comments on this topic at this time.

7. CPM/RMR Review

Through this initiative, the ISO is planning to identify any needed changes to the capacity procurement mechanism (CPM) or reliability must run (RMR) mechanisms, particularly focusing on the existing cost allocation tools. Additionally, the ISO will specify the process for backstop procurement of essential reliability resources (ERRs) if they are not procured through the RA process. Please provide comments on this scope.

Comments:

AWEA California offers no comments on this topic at this time.

Scope of Policy Examination

The ISO's has identified the initial scope for this stakeholder process as the items listed above. Please provide comments on the proposed scope. If there are specific items not already identified by the ISO that you believe should be considered, please provide specific rationale for why the ISO should consider it as part of this initiative.

Comments:

The proposed scope appears to address major RA enhancements that the ISO should be considering in a changing landscape. AWEA California is encouraged by the broad nature of this stakeholder initiative and the ISO's vision of reexamining the RA program in light of the rapid transition to clean resources on the ISO, and the broader western, grid.

Other

Please provide any comments not addressed above, including any comments on process or scope of the RA Enhancements initiative, here.

Comments:

AWEA California offers no additional comments at this time.