



Stakeholder Comments Template

RA Enhancements

This template has been created for submission of stakeholder comments on the straw proposal part two that was published on February 28. The 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. Submissions are requested by close of business on March 20.

Submitted by	Organization	Date Submitted
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Please provide your organization's comments on the following issues and questions.

1. Review of counting rules in other ISO/RTO's

Please provide your organization's feedback on this topic, described in Section 4.1. Please explain your rationale and include examples if applicable.

2. Capacity counting and availability best practices

Please provide your organization's feedback on this topic, described in section 4.2. Please explain your rationale and include examples if applicable.

3. RA counting rules and assessment enhancements

Please provide your organization's feedback on the following sub-section topics, described in section 4.3.

Please indicate any analysis and data review that your organization believes would be helpful to review on the this topic. Please provide details and explain your rationale for the type of data and analysis that you suggest.

- a. Calculating NQC, UCAP, and EFC values topic, described in section 4.3.1.

AWEA-California looks forward to continued discussion on these topics, and others, as this stakeholder process continues. At this time, we offer only high-level comments on focusing on EFC, including EFC (and UCAP) for imports.

The calculation of UCAP, for resources with an ELCC, as equal to the ELCC appears to be a reasonable starting point. However, in determining the EFC, CAISO has proposed that the EFC would equal the UCAP (ELCC for wind and solar) multiplied by the percent of available capacity economically bid into the CAISO's market. Relying on economic bidding, as a component for determining EFC is reasonable. However, the simplified approach proposed in the Straw Proposal fails to recognize the fact that resources, such as wind generation, can actually decrease the net load ramp and thus their EFC value may be higher than the ELCC value of the resource. We encourage CAISO to consider this and work with the CPUC, as necessary to address EFC calculation for resources that reduce the three-hour net load ramp.

For imports, CAISO is exploring different options for determining UCAP and, as we understand it, also for making imports eligible for providing flexible capacity. We recommend CAISO consider different types of imports, especially dynamic transfers and imports tied to a specific resource, and whether use of dynamic transfer/resource specific imports can be more easily addressed in UCAP (and EFC) accounting than other import types.

- b. Determining System, Local, and Flexible RA requirements topic, described in section 4.3.2. Please explain your rationale and include examples if applicable.
- c. RA showings, supply plans, and assessments topic, described in section 4.3.3. Please explain your rationale and include examples if applicable.
- d. Backstop capacity procurement topic, described in section 4.3.4. Please explain your rationale and include examples if applicable.

4. Review of RA import capability provisions

Please provide your organization's feedback on the following sub-section topics, described in section 4.4.

Please indicate any analysis and data review that your organization believes would be helpful to review on the this topic. Please provide details and explain your rationale for the type of data and analysis that you suggest.

- a. Maximum Import Capability Calculation review, described in section 4.4.1. Please explain your rationale and include examples if applicable.

- b. Available Import Capability Allocation Rrocess review, described in section 4.4.2. Please explain your rationale and include examples if applicable.

Additional comments

Please offer any other feedback your organization would like to provide on the RA Enhancements straw proposal – part two.

AWEA-California does not offer additional comments at this time, but looks forward to continued discussions in the RA Enhancements initiative.