



## Stakeholder Comments Template

### Pseudo-Ties of Shared Resources

This template has been created for submission of stakeholder comments on the Issue Paper and Straw Proposal, and the associated May 14 meeting discussion, for the Pseudo-Ties of Shared Resources initiative. The paper, stakeholder meeting presentation, and all information related to this initiative is located on the [initiative webpage](#).

Upon completion of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com). **Submissions are requested by close of business May 29, 2020.**

Submitted by	Organization	Date Submitted
<i>Erin Kester</i>	<i>Avangrid Renewables</i>	<i>6/1/2020</i>

**Please provide your organization's general comments on the following issues and answers to specific requests.**

#### 1. Metering and Telemetry Requirements

Please provide your organization's feedback on the metering and telemetry requirements, as described within the issue paper and straw proposal. Please explain your rationale and include examples if applicable.

Avangrid Renewables appreciates this opportunity to submit limited comments on this stakeholder initiative to address Pseudo-Ties of Shared Resources. The scope of this initiative appears to be limited to resources external to the CAISO BAA, but Avangrid Renewables wonders if the scope might be expanded to be applicable to internal generating resources as well. Specifically, Avangrid Renewables would like the CAISO to address the treatment of VER resources in its proposal and to expand the scope to include resources internal to the CAISO BAA.

VERs, both internal to the CAISO or pseudo-tied often have multiple offtakers who have a portion of a resource assigned to them via contractual terms, therefore analogous to a jointly owned or shared unit. Each offtaker may wish to bid their portion of the resource into the CAISO using economic bids, but currently the requirements of Appendix Q of the CAISO tariff make it difficult to separate one resource into multiple resource IDs which would be an initial step to accommodate economic bidding and dispatch.

CAISO Tariff Appendix Q, Section 3.1.1.1 states “Each wind Eligible Intermittent Resource shall install a minimum of one meteorological station to measure barometric pressure, temperature, wind speed and direction. If a wind Eligible Intermittent Resource has a rated capacity of five (5) MW or greater, the Eligible Intermittent Resource shall install a minimum of two meteorological stations to measure barometric pressure, temperature, wind speed and direction.”

This means that for an operational VER asset to be split into multiple resource IDs to be in compliance with Appendix Q, it must first install 2 meteorological stations per resource ID. For example, in order for one VER resource to be split into 4 resources to accommodate 4 offtakers, it would be required to install an additional 6 meteorological stations to be in compliance with this section of the tariff.

From a practical perspective, the additional meteorological stations would create unnecessary redundancy and a costly barrier for VERs to be able to split one resource with multiple offtakers into separate resources. A new meteorological tower can cost over six figures to permit, procure and install. Multiple new meteorological stations can cost tens of thousands of dollars each to procure and install.

Avangrid Renewables would like the CAISO to comment on whether Appendix Q requirements for Variable Energy Resources (VERs) might be revised to accommodate the proposed changes for Joint Owned Units, both pseudo-tied as well as internal to the CAISO BAA.

## **2. Outage Management and Reporting Requirements**

Please provide your organization’s feedback on the outage management and reporting requirements, as described within the issue paper and straw proposal. Please explain your rationale and include examples if applicable.

## **3. Treatment of Minimum Load and Start-Up Costs**

Please provide your organization’s feedback on the proposed treatment of minimum load and start-up costs, as described within the issue paper and straw proposal. Please explain your rationale and include examples if applicable.

## **4. Additional comments**

Please offer any other feedback your organization would like to provide on the issue paper and straw proposal.