



Stakeholder Comments Template

Resource Adequacy Enhancements

This template has been created for submission of stakeholder comments on the Resource Adequacy Enhancements fourth revised straw proposal that was published on March 17, 2020. The proposal, stakeholder meeting presentation, and other information related to this initiative may be found on the initiative webpage at:

<http://www.caiso.com/StakeholderProcesses/Resource-Adequacy-Enhancements>

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **April 7, 2020**.

Submitted by	Organization	Date Submitted
<i>Margaret Miller</i>	<i>Avangrid Renewables</i>	<i>April 14, 2020</i>

Please provide your organization's overall position on the RA Enhancements fourth revised straw proposal:

- Support
- Support w/ caveats
- Oppose
- Oppose w/ caveats
- No position

Please provide your organization's comments on the following issues and questions.

Avangrid Renewables appreciates the opportunity to submit comments on the Fourth Revised Straw Proposal on Resource Adequacy Enhancements. Avangrid Renewables' comments are specific to the import RA provisions proposed by the CAISO.

1. System Resource Adequacy

Please provide your organization's feedback on the System Resource Adequacy topic as described in section 4.1. Please explain your rationale and include examples if applicable.

- a. Please provide your organization's feedback on the System RA Showings and Sufficiency Testing topic as described in section 4.1.1. Please explain your rationale and include examples if applicable.
- b. Please provide your organization's feedback on the Planned Outage Process Enhancements topic as described in section 4.1.2. Please explain your rationale and include examples if applicable.
 - i. Please provide your organization's feedback on when bids should be submitted and how and when they could be changed under Option 2: CAISO procures all planned outage substitution capacity, and what are the implications of doing so under any proposed option.
 - ii. Please provide your organization's feedback on whether or not the Planned Outage Substitution Capacity Bulletin Board is necessary and, if so, why given the effort to develop and maintain.
- c. Please provide your organization's feedback on the RA Import Provisions topic as described in section 4.1.3. Please explain your rationale and include examples if applicable.

Avangrid Renewables ("AVR") is supportive of a number of elements of the CAISO's proposed RA import provisions with some caveats and concerns that are described below.

- AVR supports source specification at the time of RA showing and continues to support allowing source specification to include multiple resources from a Balancing Authority Area. AVR supports the CAISO's proposal to allow resource specific, non-dynamic, dynamic and pseudo tied resources to meet this requirement. Resources can be identified in advance and telemetry provided as necessary.
 - AVR requests the CAISO clarify rules for substitution of RA resources under this proposal.
- The CAISO states that designated import RA supply must be surplus to the source BA's needs and not committed to any other external BA or entity. AVR seeks clarity on the following:
 - Can multiple attributes be sold on the same MW within the proposed rules? There are multiple attributes for a renewable supplier to sell to a counterparty that include RPS, Specified Source and capacity attributes.

- What happens after the market has run and the RA unit has met its Must Offer Obligations? Can then energy be sold to others and if so, what is the timing of the potential sale from that import RA resource?
- AVR does not oppose the requirement for firm transmission to deliver import RA to the CAISO but does not believe this requirement is necessary.
 - Rules and protocols under the existing WSPP Schedule C (“Firm Capacity/Energy Sale or Exchange Service”) allows for a firm product to be transacted on nonfirm transmission. This construct has worked effectively and has been accepted by FERC in a number of different applications over the years. It is unclear why a new “super firm” criteria is now needed to deliver RA effectively considering the other safeguards being proposed.
- AVR opposes the CAISO’s proposed changes to the must offer obligation for imports. AVR supports retaining a MOO that extends into the real-time market only if awarded in the day-ahead or in RUC.
 - Changes to the MOO will reduce market efficiency by tying up transmission that could be used to dispatch other efficient resources and will increase costs to supply import RA.
 - Please clarify how changes to the MOO in this initiative synch up with what is being proposed for MOO in the DA Markets Enhancements initiative. It appears what the CAISO is proposing here for imports is not aligned with what is being proposed in the DA Enhancements initiative where the real-time MOO is proposed to be based on imbalance reserve and reliability capacity schedules.
- AVR is still seeking answers to the questions below included in prior comments specific to the Third Revised Straw Proposal.
 - Avangrid Renewables would like the CAISO to clarify that currently, and under the proposed changes, it is permissible for a resource in an EIM Entity area that has an RA obligation, but that does not get awarded in the Integrated Forward Market, to be counted towards the EIM Entity resource sufficiency tests for the real-time market. Avangrid Renewables would like the CAISO to provide examples for both EIM Participating and Non-Participating resources, and to clarify for each which aspects of the resource sufficiency tests the capacity would be counted towards.
 - Avangrid Renewables requests and encourages the CAISO to be mindful of the multiple potential market scenarios, including but not limited to those outlined below, for Import RA resources following implementation of the proposed policy in the Fall 2021 market release and likely continuing for multiple years as EIM and EDAM adoption and expansion matures. Avangrid Renewables believes it is critical that the CAISO develop policy in the RA Enhancements initiative specific to RA Imports that accounts for the gradual maturation of the EIM and EDAM markets in the coming years.

- Scenario 1: Import RA resource in an EIM-only area
- Scenario 2: Import RA resource in an EDAM/EIM area as a Non- Participating Resource.
- Scenario 3: Import RA resource in an EDAM/EIM area as a Participating Resource.
- Scenario 4: Import RA resource in neither an EDAM nor EIM area.

2. Backstop Capacity Procurement Provisions

Please provide your organization's feedback on the Backstop Capacity Procurement Provisions topic as described in section 4.2. Please explain your rationale and include examples if applicable.

- a. Please provide your organization's feedback on the Capacity Procurement Mechanism Modifications topic as described in section 4.2.1. Please explain your rationale and include examples if applicable.
- b. Please provide your organization's feedback on the Making UCAP Designations topic as described in section 4.2.2. Please explain your rationale and include examples if applicable.
- c. Please provide your organization's feedback on the Reliability Must-Run Modifications topic as described in section 4.2.3. Please explain your rationale and include examples if applicable.
 - i. Please provide your organization's feedback on an appropriate availability incentive design to apply to RMR resources after the removal of the RAIM tool.

- d. Please provide your organization's feedback on the UCAP Deficiency Tool topic as described in section 4.2.4. Please explain your rationale and include examples if applicable.
3. Please provide your organization's feedback on the implementation plan, including the proposed phases, the order these policies must roll out, and the feasibility of the proposed implementation schedule, as described in section 5. Please explain your rationale and include examples if applicable.
4. Please provide your organization's feedback on the proposed decisional classification for this initiative as described in section 6. Please explain your rationale and include examples if applicable.

Additional comments

Please offer any other feedback your organization would like to provide on the Resource Adequacy Enhancements fourth revised straw proposal.