



Stakeholder Comments Template

Resource Adequacy Enhancements

This template has been created for submission of stakeholder comments on the Resource Adequacy Enhancements third revised straw proposal that was published on December 20, 2019. 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 **January 27, 2020**.

Submitted by	Organization	Date Submitted
Erin Kester - Policy, Regulation and Markets Manager 503-796-7110	Avangrid Renewables, LLC	1/27/2020

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

Avangrid Renewables appreciates the opportunity to submit these limited comments on the Third Revised Straw Proposal on Resource Adequacy Enhancements published on December 20, 2019. Avangrid Renewables is a leading renewable energy company in the United States, owning and operating 7.3 gigawatts of installed renewable energy capacity, primarily using wind power, with a presence in 22 U.S. states.

1. System Resource Adequacy

Please provide your organization's feedback on the System Resource Adequacy topic as described in section 5.1. Please explain your rationale and include examples if applicable.

Please provide your organization's position on the System Resource Adequacy topic as described in section 5.1. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

2. Flexible Resource Adequacy

Please provide your organization's feedback on the Flexible Resource Adequacy topic as described in section 5.2. Please explain your rationale and include examples if applicable.

Please provide your organization's position on the Flexible Resource Adequacy topic as described in section 5.2. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

3. Local Resource Adequacy

Please provide your organization's feedback on the Local Resource Adequacy topic as described in section 5.3. Please explain your rationale and include examples if applicable.

Please provide your organization's position on the Local Resource Adequacy topic as described in section 5.3. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

4. Backstop Capacity Procurement Provisions

Please provide your organization's feedback on the Backstop Capacity Procurement Provisions topic as described in section 5.4. Please explain your rationale and include examples if applicable.

Please provide your organization's position on the Backstop Capacity Procurement Provisions topic as described in section 5.4. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

Additional Comments

Avangrid Renewables has specific comments on the following sections of the Third Revised Straw Proposal:

Section 5.1.6

- **RA Import Proposal**
 - The CAISO proposes to require specification of the Source BA for any NRS-RA imports used on RA and Supply Plans for monthly showings.
 - Avangrid Renewables agrees that the specification of the Source BA is appropriate.
- **Reconsideration of Resource Specific Requirements for RA Imports**
 - In this proposal, the CAISO has asked for feedback and other suggested options regarding the need for the specification of RA import resource sources.
 - Avangrid Renewables would like the CAISO to explore the creation of a new resource specific import category or definition to allow a Market Participant to be able to use a pool or group of resources within its portfolio to sell Import RA. The Market Participant would be able to

provide e-Tag information on a day-ahead basis to demonstrate its ability to deliver energy if awarded in the integrated forward market and scheduled in the real-time market.

- **Clarification Requested – Double Counting of RA Imports**

- On page 52 of the proposal, the CAISO states:

"With the potential extension of the day-ahead market to EIM entities, the CAISO believes that, at minimum, RA import resources must specify the source BA. The proposed modification would allow the CAISO to ensure that RA imports are not double counted for EIM entities' resource sufficiency tests.

Without this rule, it would be possible for an EIM entity to count on capacity from a resource within its own BA to pass the EIM resource sufficiency evaluation, while also showing the resource as import RA to the CAISO. This is not a reasonable outcome because the resource is incapable of physically meeting both the BA's flexibility needs and the CAISO's RA needs. Requiring a designation of the source Balancing Area ("Source BA") will be sufficient to ensure RA imports are not being double counted for EIM resource sufficiency tests".

- 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 (see above).
 - 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.