

**Comments on
CAISO's August 12, 2020
2021 Revised Draft Policy Initiatives Catalog**

August 27, 2020

CDWR continues to highly support these catalog initiatives:

- **7.1.7 Pumped Storage with Multiple Pumping Levels (D)**

CDWR appreciates the addition of this initiative to the Revised Catalog and supports the CAISO's exploration of ways to further accommodate resources with limitations in the CAISO's markets.

- **7.1.47 Aggregated Pumps and Pumped Storage (D)**

Along with 7.1.7, CDWR fully supports CAISO in conducting a study on what improvements could be made to participating load functionality and to explore this untapped potential that can benefit grid reliability. CDWR believes that allowing Participating Load to bid demand in the real-time market would greatly reduce the current barriers to its participation in wholesale demand response. This would allow CDWR to more flexibly bid and possibly improve system reliability over the course of any day, including periods of over-generation or high and shifting ramps. Noteworthy is that during the recent heat wave and resulting energy emergency, CAISO called upon CDWR to reduce its pumping load during critical periods.

- **7.2.2 Congestion Revenue Rights Revenue Sufficiency (D)**