California ISO

Stakeholder Comments Template

RA Enhancements

This template has been created for submission of stakeholder comments on the RA Enhancements Issue Paper that was published on October 22, 2018. The Issue 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.

Submitted by	Organization	Date Submitted
Liz Anthony	*CEERT*	*11/14/18*

Submissions are requested by close of business on **November 14, 2018.**

Please provide your organization's comments on the Issue Paper scope items listed below and any additional comments using this template.

Scoping Items

The ISO's has identified the following items for the initial scope of this stakeholder process. Please provide comments on each of the scoping items.

1. **RA Counting and Eligibility Rules**

   a. **System RA**

   The ISO proposes to review the RA counting and eligibility provisions related to RA resource NQC adjustments in this initiative, including a review of the application of Effective Forced Outage Rate (EFOR) performance criteria and accompanying NQC reductions and a review and clarification of RA counting rules for RA resources. Please provide comments on this scope.

   Comments:

   CEERT is supportive of incorporating Effective Forced Outage Rate into NQC calculations for RA resources.

   b. **Flexible RA**

The ISO proposes to continue exploring enhanced flexible RA counting rules started in the FRACMOO2 stakeholder process. More specifically, the ISO will continue assessing the operational capabilities required from the fleet to align with both the Day-Ahead Market Enhancements (DAME) and the Extended Day Ahead Market (EDAM) and what flexible RA counting rule changes may be needed. Please provide comments on this scope.

Comments:

CEERT agrees an evaluation of the flexible resource adequacy criteria should be continued after the completion of DAME and EDAM. This evaluation should include whether flexible resource adequacy is necessary after the day ahead flexible ramping product has been developed or if the market changes addressed the need to incentivize fast ramping resources.

2. Review of Resource Adequacy Import Capability Provisions

The ISO proposes to conduct a comprehensive review of the ISO's Import Capability provisions, including; calculation methodologies, allocation process, and reassignment/trading provisions. The ISO believes that is may also be necessary to consider multi-year assessments and allocations. Please provide comments on this scope.

Comments:

No comments at this time.

3. Rules for RA imports

The ISO proposes to include a review of RA import rules and provisions in the scope of this initiative, including a reassessment of the requirements and rules for the sources behind RA imports. Please provide comments on this scope.

Comments:

No comments at this time.

4. Must Offer Obligations, Substitution Rules, and RAAIM

The ISO proposes to include a review of the following set of issues as a part of this stakeholder initiative; need for substitution rules and RAAIM, developing an emergency or event based RAAIM trigger, and must offer obligations for RA imports. Please provide comments on this scope.

Comments:

No comments at this time.

5. System and Flexible Capacity Assessments and Adequacy Tests

As part of this stakeholder initiative, the ISO is considering a new tool to assess the adequacy of the system and flexible RA fleet. Please provide comments on this scope.

Comments:

No comments at this time.

6. **Meeting Local RA Needs**

   a. **Local capacity assessments with availability limited resources**

As part of this stakeholder initiative the ISO proposes to enhance the ISO's local capacity technical analysis to assess the impact of availability limited resources on local capacity needs. Please provide comments on this proposed scope.

Comments:

CEERT is strongly supportive of the ISO enhancing the local capacity technical analysis to better account for use-limited resources. Within the local capacity technical analysis, a separate ELCC should be developed for each resource based on the post-contingency load shape in order to more accurately account for the resources potential during a contingency.

   b. **Meeting local capacity needs with slow demand response**

Through this initiative, the ISO proposes to explore how to best operationalize slow DR through pre-contingency dispatch so these resources can mitigate local reliability concerns and qualify for local RA. Please provide comments on this scope.

Comments:

CEERT is strongly supportive of the ISO working to integrate slow-response DR. Within this iniative, the ISO should develop protocols for the dispatch of hybrid slow-response DR with battery post-contingency. CEERT urges this initiative to be coordinated with the CPUC to ensure consistency and viability for slow-repsonse DR providers.

7. **CPM/RMR Review**

Through this initiative, the ISO is planning to identify any needed changes to the capacity procurement mechanism (CPM) or reliability must run (RMR) mechanisms, particularly focusing on the existing cost allocation tools. Additionally, the ISO will specify the process for backstop procurement of essential reliability resources (ERRs) if they are not procured through the RA process. Please provide comments on this scope.

Comments:

No comments at this time.

Scope of Policy Examination

The ISO's has identified the initial scope for this stakeholder process as the items listed above. Please provide comments on the proposed scope. If there are specific items not already identified by the ISO that you believe should be considered, please provide specific rationale for why the ISO should consider it as part of this initiative.

> **Comments:**
>
> No comments at this time.

Other

Please provide any comments not addressed above, including any comments on process or scope of the RA Enhancements initiative, here.

> **Comments:**
>
> No comments at this time.