



Stakeholder Comments Template

Hybrid Resources Initiative: Straw Proposal

This template has been created for submission of stakeholder comments on the **Hybrid Resources Initiative, Revised Straw Proposal** that was held on December 17, 2019. The meeting material and other information related to this initiative may be found on the initiative webpage at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/HybridResources.aspx>

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on January 14, 2019.

Submitted by	Organization	Date Submitted
<i>John Sterling</i>	<i>First Solar, Inc.</i>	<i>1/14/2020</i>

Please provide your organization's comments on the following topics and indicate your organization's position on the topics below (Support, Support with caveats, Oppose, or Oppose with caveats). Please provide examples and support for your positions in your responses as applicable.

First Solar is greatly appreciative of the efforts by CAISO staff to seek solutions that will result in the successful integration of hybrid resources. The results of this revised straw proposal show a significant amount of positive improvements from the initial issue paper. While we continue to seek additional modifications related to resource adequacy, as outlined below, it is clear that CAISO staff is committed to incorporating hybrid resources onto the grid and leveraging their capabilities in the market.

1. Terms and Definitions

Please provide your organization's feedback on the proposed terminology and definitions as described in the revised straw proposal.

First Solar supports the definitions proposed by the CAISO.

2. Forecasting

Please provide your organization's feedback on the forecasting topic as described in the straw proposal.

First Solar supports the forecasting approaches outlined in the revised straw proposal.

3. Markets and Systems

Please provide your organization's feedback on the markets and systems topic as described in the revised straw proposal.

First Solar believes the approach outlined by CAISO is reasonable. Allowing hybrid resources to modify their forecast in the real-time markets creates the ability to mitigate most (but not all) weather-related risk.

4. Ancillary Services

Please provide your organization's feedback on the ancillary services topic as described in the revised straw proposal.

First Solar has no comments at this time.

5. Metering and Telemetry

Please provide your organization's feedback on the metering and telemetry topic as described in the revised straw proposal.

First Solar has no comments at this time.

6. Resource Adequacy

Please provide your organization's position on the Resource Adequacy topic as described in the revised straw proposal.

First Solar agrees with CAISO that the CPUC proposed methodology is conservative in nature, and fully supports CAISO staff in its efforts to engage with the CPUC on developing a more accurate QC methodology for hybrid resources. First Solar continues to support an additive approach, capped at the POI, for calculating the RA value for a hybrid resource.

Additional comments

Please offer any other feedback your organization would like to provide on the Hybrid Resources Initiative.