



# **Enable Non-Generating Resources to Participate in Inter-SC Trade (IST)**

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# Current Market Design for NGRs

In the current market design, standalone battery storage projects are **NOT** available to be selected in the “Location” dropdown list for transacting Physicals in Inter-SC Trade (IST). Battery storage resources are categorized as Non-Generating Resources.

**According to the SIBR Business Rule 121007, only registered Generator Resources are allowed for Physical Energy Product.**

**Create trade**

Date: 05/13/2024

Coordinator: [Redacted]

Product type: PHY Energy

From: [Redacted]

Trade name: [Redacted]

Trade qty: [Redacted]

Trade type: Inter-SC Trades

Location: GANSO\_1\_WSTBM1

To: EXCHEC\_7\_UNIT 1  
EXCLSG\_1\_SOLAR  
FELLOW\_7\_QFUNTS  
FIFTHS\_2\_FSSR1  
FLOWD2\_2\_FPLWND  
FLOWD\_2\_RT2WD2  
FLOWD\_2\_WIND1  
FMEADO\_6\_HELLHL  
FMEADO\_7\_UNIT  
FORBST\_7\_UNIT 1  
FRESHW\_1\_SOLAR1  
FRIANT\_6\_UNITS  
FRNTBW\_6\_SOLAR1  
FROGTN\_1\_UTICAA  
FROGTN\_1\_UTICAM  
**FTSWRD\_6\_TRFORK**  
FTSWRD\_7\_QFUNTS  
FULTON\_1\_QF  
GALE\_1\_SR3SR3  
GANSO\_1\_WSTBM1

Hours: [Redacted]

# GridStor's Proposal

- CAISO should allow Non-Generating Resources (NGRs) to participate in Inter-SC trade and offer Physical Energy Product.
- Validation process expected to be status quo, as PHYs for NGRs will still be validated prior to and after the forward energy market clears.
- Market enhancement is low complexity for operations and can be completed in the near term with few resources.

Business Impacts	Description
SIBR Business Rules	Yes
BPM	BPM edits for sections that reference IST and NGR
SIBR UI	Yes, add NGR nodes

# Rationale

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- **MEET SB100 GOALS (Strategic Objective 2):** CAISO and California regulators expect energy storage projects to shift the timing of solar and wind power output away from oversupply hours and into hours where energy market prices signal a need, strengthening system resource adequacy and meeting California's GHG goals.
- **MORE EFFICIENT RULES & INTERFACES (Strategic Objective 3C):** Enabling battery storage to offer its high level of assurance/certainty in scheduling firm energy multiple days in advance of the operating day will improve overall market efficiency and reduce the level of uncertainty in the preschedule window -- enabling more storage technologies via efficient rules and interfaces that can be used for transactions across the WECC.
- **SUPPORT RESOURCE ADEQUACY (Strategic Objective 2C):** Allowing battery storage projects to participate in Physical IST would also complement the existing resource adequacy structure. When an RA resource experiences a forced outage, battery storage can offer supplement capacity or replacement energy by selling firm and physical product through IST. Similarly, being able to make transactions multiple days in advance of the operating day could mitigate challenges regarding energy sufficiency as it relates to storage providing RA.
- **AVOID DISCRIMINATION:** Allowing battery storage to transact Physical Energy through IST meets regulatory requirements to avoid undue discrimination among resource types.