



Stakeholder Comments Template

Resource Adequacy Enhancements

This template has been created for submission of stakeholder comments on the Resource Adequacy Enhancements fourth revised straw proposal that was published on March 17, 2020. 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 **April 14, 2020**.

Submitted by	Organization	Date Submitted
<i>Dennis Cakert</i> Dennis@hydro.org 202-697-2404	<i>National Hydropower Association</i>	<i>April 14, 2020</i>

The National Hydropower Association (NHA) appreciates this opportunity to comment on the California ISO (CAISO) Resource Adequacy (RA) Enhancements Fourth revised straw proposal issued March 17, 2020. As the national trade association for the hydropower industry, our comments focus on the factors influencing 1) accurate modeling for different forms of hydropower; and 2) the timing and duration of planned outages of hydropower units. We also continue to support a resource adequacy program that addresses the problem of speculative supply.

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

1. System Resource Adequacy

Please provide your organization's feedback on the System Resource Adequacy topic as described in section 4.1. Please explain your rationale and include examples if applicable.

- a. Please provide your organization's feedback on the System RA Showings and Sufficiency Testing topic as described in section 4.1.1. Please explain your rationale and include examples if applicable.

The CAISO plans to conduct a "portfolio deficiency test of the resources shown for RA to determine if the portfolio is adequate to serve load under various load and net load conditions during all hours of the day" and has worked with stakeholders to consider a variety of approaches for this analysis.

How to accurately model hydropower is a topic of discussion across the United States. There are many different forms of hydropower, including run of river, run of river with storage, and pumped storage hydropower, and modeling each resource presents its own challenges. In addition, there are several new pumped storage projects with licenses or preliminary permits from FERC in California and nearby states. These projects can help improve system-wide RA and it is important they are modeled accurately.

NHA is interested in working with the CAISO, in this proceeding and others, to ensure all types of hydropower and pumped storage is accurately modeled.

- b. Please provide your organization's feedback on the Planned Outage Process Enhancements topic as described in section 4.1.2. Please explain your rationale and include examples if applicable.

In Option 1, the CAISO is considering no longer allowing planned outages between June 1 and October 31, except for short term and off-peak outages. NHA requests the CAISO consider that there are many different factors that may lead a hydropower operator to request an outage during June 1 – Oct 31.

Decisions to take planned outages at hydropower facilities are made on a resource by resource basis. These decisions consider many different factors, including scope of work, priority of work, type of facility and coordination among upstream and downstream facilities, and requirements of the FERC license.

All else being equal, it is more economical to take a planned outage when water levels are low, which most often occurs during the timeframe being considered by CAISO for no planned outages – June 1 through October 31. Some hydropower resources with storage capability, either at the facility or upstream, store water to be available to serve high seasonal load during these months, but that is not the case for all hydropower resources.

NHA requests the CAISO consider that planned outages for hydropower resources are made on a resource by resource basis. Avoiding planned outages from June 1 – Oct 31 may not allow for optimal hydropower performance, while water availability in the late summer and fall should also be taken into account.

- c. Please provide your organization's feedback on the RA Import Provisions topic as described in section 4.1.3. Please explain your rationale and include examples if applicable.

NHA supports the CAISO's proposal to require all import RA to specify the specific unit, aggregation of units, or the source balancing authority area. These restrictions should weed out speculative import supply, thus helping with CAISO system reliability while ensuring that the price of real physical supply isn't artificially suppressed due to speculative supply.

NHA is especially supportive of the CAISO inclusion of “aggregation of physically linked resources” which is essential for hydropower owners with multiple projects on the same river to supply RA.

2. Backstop Capacity Procurement Provisions

No comments at this time.

Additional comments

No comments at this time.