



Stakeholder Comments Template

Hybrid Resources Initiative: Straw Proposal

This template has been created for submission of stakeholder comments on the **Hybrid Resources Initiative, Straw Proposal** that was held on October 3, 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 October 21, 2019.

Submitted by	Organization	Date Submitted
<i>(submitter name and phone number)</i> Grant Rosenblum 530.219.1232	<i>(organization name)</i> NextEra Energy Resources, LLC	<i>(date)</i> October 21, 2019

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.

NextEra Energy Resources, LLC (NextEra) strongly commends the California ISO for its efforts, leadership, and policy recommendations related to hybrid resources. The foundational principal of allowing the resource developer and scheduling coordinator to control the combined facility is essential to promoting the growth and efficient use of hybrid resources. We further strongly support providing the California ISO with any necessary metering, telemetry, and other data necessary to validate the hybrid resources operate in a manner consistent with their market obligations.

NextEra does recommend accelerating the timing of the interconnection constraint for combined resources. The Straw Proposal current states that the interconnection constraint will be implemented in the Fall of 2021. However, the California ISO should ensure that the interconnection constraint is in-place and functioning in time to accommodate the on-line requirements of the recent California Public Utilities Commission (CPUC) Proposed Decision Requirement Electric System Reliability Procurement for 2021-2023 (R16-02-007 (Sept. 12, 2019)). In that decision, resources capable of providing incremental resource adequacy capacity must be on-line by August 1, 2021. Accordingly, a couple months of advancement of the interconnection constraint

solution would greatly assist the market in offering capacity into the upcoming CPUC solicitation.

1. Hybrid Resource Definition

Please provide your organization's feedback on the Hybrid Resource Definition as described in the straw proposal.

Support.

2. Hybrid Resources Business Drivers and Use Cases

Please provide your organization's feedback on the Hybrid Resources Business Drivers and Use Cases described in the straw proposal.

Support.

3. Forecasting

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

Support.

4. Markets and Systems

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

Support.

5. Ancillary Services

Please provide your organization's feedback on the ancillary services topic as described in the straw proposal. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

Support.

6. Metering and Telemetry

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

Support.

7. Resource Adequacy

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

NextEra strongly agrees with the California ISO that the expedient approach to calculating the Qualifying Capacity (QC) of hybrid resources is to adopt a default QC methodology that utilizes the existing CPUC methodology for each of the underlying resource components generation technology and combines each component's technology type based QC value in an additive manner. NextEra also appreciates the California ISO urging action by the CPUC in this area.

Additional comments

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