



California ISO

# Capacity Procurement Mechanism Enhancements

Track 1 **Revised** Draft Final Proposal

~~September 16, 2022~~ **November 29, 2022**

## Market & Infrastructure Policy

*Note: this blueline version shows changes relative to the draft final proposal published on 9/16/22. Please scroll down to find the “clean” version*

# Capacity Procurement Mechanism Enhancements

## Track 1 Revised Draft Final Proposal

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## 1. Executive Summary

The ISO uses its capacity procurement mechanism (CPM) to address resource adequacy (RA) deficiencies and potential reliability concerns. The ISO can use its CPM authority to address specific circumstances defined by the following six CPM designation types:<sup>1</sup>

1. Insufficient local capacity area resources in an annual or monthly RA plan
2. A collective deficiency in local capacity area resources
3. Insufficient RA resources in a load-serving entity's annual or monthly RA plan
4. A CPM significant event
5. A reliability or operational need for an exceptional dispatch CPM
6. A cumulative deficiency in the total flexible RA capacity included in the annual or monthly flexible RA capacity plans, or in a flexible capacity category in the monthly flexible RA capacity plans

When the ISO makes CPM designations, it relies on capacity willingly offered to the ISO by resource owners. To attract such capacity, the ISO conducts annual, monthly and intra-monthly competitive solicitation processes, into which resource owners may offer their capacity to the ISO at prices up to a soft offer cap, currently set at \$6.31/kw-month.<sup>2</sup> Resource owners may also cost justify offers above the soft offer cap.

The CPM Enhancements stakeholder initiative is comprised of at least two tracks. Track 1 addresses five operational and process enhancement issues, and the ISO is planning to take Track 1 for approval at the ~~December 2022~~ **March 2023** Board of Governors meeting. Track 2 will re-examine the CPM soft offer cap. It will be started at some point in the future and will likely require a longer stakeholder process than Track 1.

Summary of Track 1 Proposals:

Note: in response to stakeholder feedback on the ~~draft final~~ **draft final** ~~straw~~ proposal, the ISO has made adjustments to the first ~~two~~ **three** of the following five proposals, **including tariff clarifications associated with the first proposal**. ~~In addition, the ISO plans to make a tariff clarification in conjunction with its first proposal.~~ For more detail on stakeholder feedback and the ISO's perspective on such feedback, please refer to section 5 of this **revised** draft final proposal.

1. Reducing the volume (MW) of significant event CPM designations and exceptional dispatch CPM designations when the designated capacity is ~~has already been committed and shown to the ISO as RA capacity~~: the ISO should be able to make mid-term significant event CPM award reductions if the designated capacity ~~is has already been committed~~ (and shown to the ISO) for

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<sup>1</sup> ISO tariff section 43A.2

<http://www.caiso.com/Documents/Section43A-CapacityProcurementMechanism-asof-Apr22-2022.pdf>

<sup>2</sup> ISO tariff section 43A.4.1.1

<http://www.caiso.com/Documents/Section43A-CapacityProcurementMechanism-asof-Apr22-2022.pdf>

an RA contract, reliability must-run (RMR) contract or monthly CPM designation (referred to here as “other capacity commitments”). This will allow capacity designated for significant events to participate in RA and RMR contracts and accept monthly CPM designations that may begin during the significant event CPM term. ~~The ISO already has this type of authority and flexibility for exceptional dispatch CPM awards. The ISO will only be allowed to make such mid-term significant event CPM award reductions when the other capacity commitments are accepted before the significant event CPM award is accepted.~~

In conjunction with this proposal ~~and in direct response to stakeholder sentiment that backstop CPM designations should not hinder the fulfillment of forward RA obligations by reducing the pool of potentially available RA capacity,~~ the ISO plans to ~~make a tariff clarification to more explicitly forbid~~ allow both significant event CPM designated capacity and exceptional dispatch CPM designated capacity ~~from taking to take~~ on new RA obligations after the CPM designation has been accepted. ~~that conflict with the CPM obligations.~~ The capacity does not need to have been shown to the ISO as RA before the CPM designation becomes effective. When the capacity designated as CPM takes on a new RA obligation, the ISO will correspondingly reduce the CPM volume to ensure that there is no double counting or double payment. Importantly, the “new RA obligations” referred to above must be shown to the ISO as RA capacity through the regular RA showing process. Non-RA commitments, such as commitments to non-ISO balancing authorities, cannot be made after the ISO makes a CPM designation, and the ISO proposes to amend the tariff to make this point explicit. Also important to note is that the ISO is not proposing to extend this new flexibility for CPM designations based on RA showing deficiencies; it is limited to significant event and exceptional dispatch CPM designation types. ~~The ISO already has this type of authority and flexibility for exceptional dispatch CPM awards.~~

2. Reducing the term of significant event CPM designations made to capacity that was not offered into the intramonthly competitive solicitation process, when the designated capacity has already been committed or is unavailable to the ISO: the ISO proposes to allow resource scheduling coordinators to voluntarily accept significant event CPM designations for less than 30 days at the resource scheduling coordinator’s discretion, ~~when such designations are made to capacity that was not offered into the intramonthly competitive solicitation process.~~ For example, the resource scheduling coordinator may have sold the capacity for the following month to a counterparty outside the ISO, or the resource may have a planned outage in the following month. This proposal will allow resource scheduling coordinators with capacity that is unavailable to the ISO for the following month to accept mid-month shorter-term significant event CPM designations, providing the ISO with more immediate access to available capacity. This proposal is similar to proposal 4.1, but it allows for shorter terms (instead of reduced volumes) and also addresses commitments that are not currently visible to the ISO (such as commitments to counterparties outside the ISO), whereas proposal 4.1 deals exclusively with commitments that are visible to the ISO at the time of designation.
3. CPM reporting via OASIS: the ISO proposes to meet its obligation to post CPM designation reports (tariff section 43A.6.2) through its open access same-time information system (OASIS),

which now receives CPM designation information directly from the ISO’s customer interface for resource adequacy (CIRA) application.

4. [CPM market notices](#): the ISO proposes to extend the CPM designation market notice deadline from two business days to five business days. This will ensure the ISO has sufficient time to collect the information needed for the market notice, undertake the proper reviews, obtain necessary approvals, and issue the market notice in a timely manner.
5. [CPM notifications to scheduling coordinators](#): the ISO proposes to make the resource scheduling coordinator contact information directly visible and editable in CIRA to avoid CPM designation notifications being sent to an outdated contact.

## 2. Stakeholder Process

The Capacity Procurement Mechanism (CPM) Enhancements stakeholder initiative is comprised of at least two tracks. Track 1 addresses operational and process enhancement issues and is the focus of this revised draft final proposal. As shown in Table 1 below, the ISOs plans to seek Track 1 approval at the ~~December 2022~~ [March 2023](#) Board of Governors meeting and implement Track 1 in 2023. Track 2 will re-examine the CPM soft offer cap and will likely require a longer stakeholder process. Track 2 will have a separate Board of Governors presentation and a later implementation timeline.

**Table 1: CPM Enhancements Stakeholder Initiative Schedule**

Date	Track 1 Milestone
July 28, 2022	Publish straw proposal
August 4, 2022	Stakeholder call on straw proposal
August 18, 2022	Due date for stakeholder comments on straw proposal
September 16, 2022	Publish draft final proposal
September 23, 2022	Stakeholder call on draft final proposal
October 7, 2022	Due date for stakeholder comments on draft final proposal
<a href="#">November 29, 2022</a> ( <del>11/8/22</del> )	Publish <a href="#">revised draft</a> final proposal
<a href="#">December 6, 2022</a>	<a href="#">Stakeholder call: revised draft final proposal</a>
<a href="#">December 20, 2022</a>	<a href="#">Due date for stakeholder comments on revised draft final proposal</a>
<a href="#">January 12, 2023</a> ( <del>11/3/22</del> )	Publish draft tariff language <a href="#">and final proposal</a>
<a href="#">January 26, 2023</a> ( <del>11/15/22</del> )	Stakeholder call: draft tariff language and final proposal
<a href="#">February 9, 2023</a> ( <del>11/17/22</del> )	Due date for stakeholder comments on draft tariff language
<a href="#">March 23, 2023</a> ( <del>12/15/22</del> )	Board of Governors presentation
2023	FERC filing and implementation

### 3. Background on CPM

The ISO uses its capacity procurement mechanism (CPM) to address RA deficiencies and other potential reliability concerns. The ISO’s use of its CPM authority is often referred to as “backstop” procurement, required when sufficient capacity has not been procured through the RA program. The ISO’s backstop procurement authority also includes reliability must-run (RMR) contracts, which the ISO uses to retain resources that would otherwise retire but the ISO determines are needed to maintain reliable grid operations based on the results of technical studies and analyses.<sup>3</sup> The ISO can use its CPM authority to procure capacity that is not committed RA capacity or RMR capacity to address specific circumstances defined by the six CPM designation types listed in Table 2. The ISO does not use RMR authority to backstop RA deficiencies.

*Table 2: CPM Designation Types<sup>4</sup>*

#	CPM Designation Type
1	Insufficient local capacity area resources in an annual or monthly RA plan
2	A collective deficiency in local capacity area resources
3	Insufficient RA resources in an LSE’s annual or monthly RA plan
4	A CPM significant event
5	A reliability or operational need for an exceptional dispatch CPM
6	A cumulative deficiency in the total flexible RA capacity included in the annual or monthly flexible RA capacity plans, or in a flexible capacity category in the monthly flexible RA capacity plans

When the ISO needs to make CPM designations, it relies on capacity willingly offered to the ISO by resource owners. To attract such capacity, the ISO conducts annual, monthly and intra-monthly competitive solicitation processes, in which resource owners may offer their capacity to the ISO at prices up to a soft offer cap, currently set at \$6.31/kw-month. Any offers above the soft offer cap must be cost-justified at FERC to recover up to a resource-specific cost of service rate.<sup>5</sup>

The existing soft offer cap of \$6.31/kw-month was set during the ISO’s capacity procurement mechanism replacement stakeholder initiative and was based on a subset of combined cycle fixed costs, as published by the California Energy Commission (CEC).<sup>6</sup> The ISO has a tariff obligation to open a

<sup>3</sup> ISO tariff section 41

<http://www.caiso.com/Documents/Section41-Procurement-RMRResources-asof-Sep28-2019.pdf>

<sup>4</sup> ISO tariff section 43A.2

<http://www.caiso.com/Documents/Section43A-CapacityProcurementMechanism-asof-Apr22-2022.pdf>

<sup>5</sup> ISO tariff section 43A.4.1.1.1

<http://www.caiso.com/Documents/Section43A-CapacityProcurementMechanism-asof-Apr22-2022.pdf>

<sup>6</sup> ISO’s Capacity Procurement Mechanism Replacement stakeholder initiative:

stakeholder initiative every four years (at the latest) to examine the soft offer cap and consider whether it needs to be changed. In its capacity procurement mechanism soft offer cap stakeholder initiative, the ISO met that tariff obligation by considering updated combined cycle fixed costs published by the CEC in May 2019.<sup>7</sup> In Track 2 of this CPM Enhancements stakeholder initiative and in accordance with its tariff obligation, the ISO plans to re-examine the soft offer cap and consider other potential enhancements.

The ISO's capacity procurement mechanism process starts with a competitive solicitation process where resource owners submit offers through the ISO's customer interface for resource adequacy (CIRA) application. The ISO's submission window requires offers to be submitted prior to any announcement of whether capacity might be needed by the ISO for a CPM designation. After offers are submitted and the adjustment window is closed, the ISO validates the offers to ensure the capacity is uncontracted. If there is a CPM need, the ISO will then select resources that meet the designation criteria at the lowest total cost. If there are insufficient offers, the ISO can offer CPM designations at the soft offer cap to capacity not offered into the competitive solicitation process.

As mentioned above, resource owners may offer their capacity to the ISO at prices above the soft offer cap, but they must cost-justify such offers at FERC based on the resource-specific going forward fixed costs, *i.e.*, fixed operation and maintenance costs, ad valorem taxes and insurance. There are two important differences between the calculation of the above-cap cost of service rate and derivation of the soft offer cap: a.) the cost of service rate is based on resource-specific inputs, whereas the soft offer cap is based on a generic 550 MW advanced combined cycle resource with duct firing; and b.) the cost of service rate calculation does not include a 20% adder, whereas the soft offer cap derivation does include a 20% adder. These differences were reflected in a May 2022 compliance filing that the ISO submitted to FERC, finalizing the above-cap cost of service rate calculation methodology.<sup>8</sup>

## 4. Proposal

In Track 1, the ISO proposes to address five CPM operational and process issues, as summarized and detailed below:

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<http://www.caiso.com/Pages/documentsbygroup.aspx?GroupID=bfe609ff-a9a1-4828-bf01-51a495bef7e2>

The current Soft Offer Cap of \$6.31/kw-month is the monthly equivalent of \$75.67/kw-year, which is equal to 120% x \$63.06/kw-year. \$63.06/kw-year is the levelized going-forward fixed cost (fixed O&M, ad valorem taxes, insurance) of a 550 MW advanced combined cycle resource with duct firing, as published by the California Energy Commission in its 2014-2015 study "Cost of New Renewable and Fossil Generation in California."

<sup>7</sup> ISO's Capacity Procurement Mechanism Soft Offer Cap stakeholder initiative:

<https://stakeholdercenter.caiso.com/StakeholderInitiatives/Capacity-procurement-mechanism-soft-offer-cap>

Estimated Cost of New Utility-Scale Generation in California: 2018 Update, CEC, May 2019

<https://www.energy.ca.gov/sites/default/files/2021-06/CEC-200-2019-005.pdf>

<sup>8</sup> Docket ER20-1075, ISO compliance filing to FERC, 5/23/22

<https://www.caiso.com/Documents/May23-2022-ComplianceFiling-CapacityProcurementMechanism-CPM-above-SoftOfferCap-ER20-1075.pdf>

- Proposal 4.1 addresses significant event CPM awards and mid-term reductions in volume (MW) required by the ISO. In addition, proposal 4.1 allows both significant event CPM designated capacity and exceptional dispatch CPM designated capacity to take on new RA obligations after the CPM designation has been accepted.
- Proposal 4.2 addresses significant event CPM awards and reductions in term at the discretion of the resource scheduling coordinator, specifically for significant event CPM designations made to capacity that was not offered into the intramonthly competitive solicitation process.
- Proposal 4.3 addresses CPM reporting.
- Proposal 4.4 addresses CPM market notices.
- Proposal 4.5 addresses CPM notifications to scheduling coordinators.

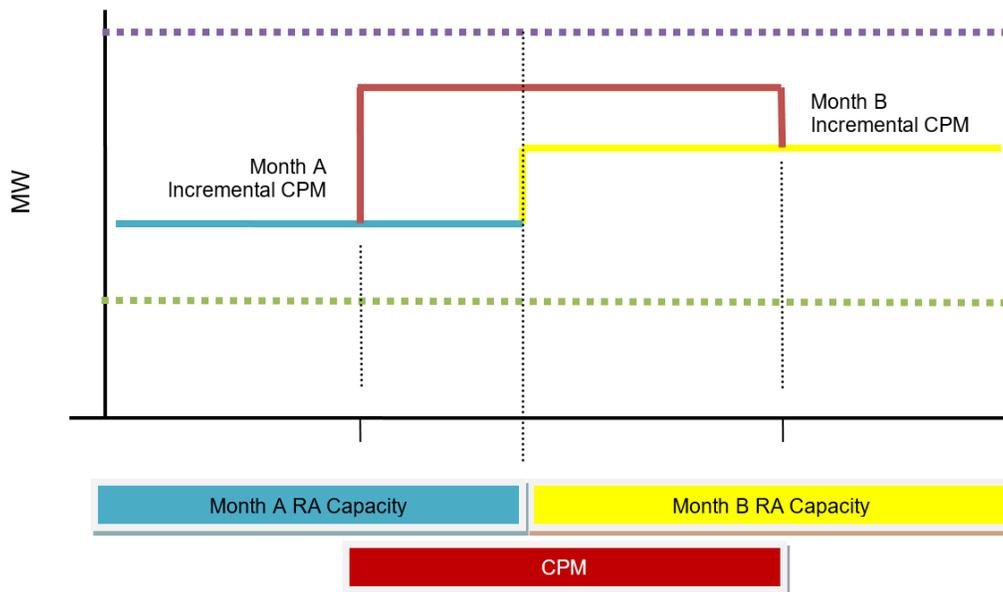
#### 4.1. Reducing the volume (MW) of significant event CPM designations and exceptional dispatch CPM designations when the designated capacity is ~~has already been~~ committed and shown to the ISO as RA capacity.

The ISO proposes that it have the ability to reduce significant event CPM awards as follows: if capacity that receives a significant event designation is ~~already~~ shown as RA capacity or ~~has received~~ a monthly CPM designation or is under an RMR contract as of a certain date, then the significant event CPM designation shall be reduced by the amount of the new RA capacity, monthly CPM designation, or RMR contract (referred to here as “other capacity commitments”) from that date through the rest of the CPM designation term. ~~The ISO will only be allowed to make such mid-term significant event CPM award reductions when the other capacity commitments are accepted before the significant event CPM award is accepted.~~ This proposal will allow capacity designated for significant events to participate in RA and RMR contracts and accept monthly CPM designations that may begin during the term of the significant event CPM designation. The ISO already has this type of authority for exceptional dispatch CPM awards (as explained and illustrated below), and it is appropriate to extend such authority to include significant event CPM awards. Like exceptional dispatch CPMs, significant event CPMs can span multiple calendar months, and the resource’s RA Capacity, RMR status and designations for monthly CPM awards may change during the term of the significant event CPM.

The ISO today has the authority to make mid-term reductions to exceptional dispatch CPM awards when the designated capacity receives an RA, monthly CPM, or RMR contract.<sup>9</sup> Figure 1 below shows a resource with RA contracts in months A and B and a 30-day exceptional dispatch CPM award that includes both months. As shown in the chart, the RA volumes increase from month A to month B, and the CPM award is decreased accordingly, keeping the total capacity awards unchanged and at the required level.

<sup>9</sup> ISO Tariff Section 43A.2.5.2.4

<http://www.caiso.com/Documents/Section43A-CapacityProcurementMechanism-asof-Apr22-2022.pdf>

**Figure 1: Illustration of ISO’s existing authority related to Exceptional Dispatch CPM Awards<sup>10</sup>**

The ISO proposes to apply this same logic to significant event CPM awards, providing the ISO with the flexibility to make a CPM designation that can volumetrically change from one calendar month to the next, if warranted by changes in RA, CPM, or RMR volumes. For example, consider a resource with 100 MW of net qualifying capacity across the year. Next, consider that this particular resource has shown to the ISO 40 MW of RA in month A and 70 MW of RA in month B. Finally, consider that the ISO wants to designate this resource for a 50 MW significant event CPM award beginning in the middle of month A. With proposal 4.1 implemented, the ISO will be able to move forward with such a CPM designation, because it will have the authority to decrease the CPM award from 50 MW to 20 MW in month B, corresponding to the increase in the shown RA from 40 MW to 70 MW. This will allow the ISO to take full advantage of uncontracted capacity in a specific calendar month, even if that uncontracted volume is not available for a full 30 days. Without this proposed flexibility, the ISO will remain unable to make significant event CPM designations for capacity it needs immediately if such capacity would become RA, RMR, or monthly CPM capacity during the term of the CPM designation.

In conjunction with proposal 4.1 and in direct response to stakeholder sentiment that backstop CPM designations should not hinder the fulfillment of forward RA obligations by reducing the pool of potentially available RA capacity, the ISO plans to allow both significant event CPM designated capacity and exceptional dispatch CPM designated capacity to take on new RA obligations after the CPM designation has been accepted. The capacity does not need to have been shown to the ISO as RA before the CPM designation becomes effective. When the capacity designated as CPM takes on a new RA obligation, the ISO will correspondingly reduce the CPM volume to ensure that there is no double counting or double payment. Importantly, the “new RA obligations” referred to above must be shown to the ISO as RA capacity through the regular RA showing process. Non-RA commitments, such as

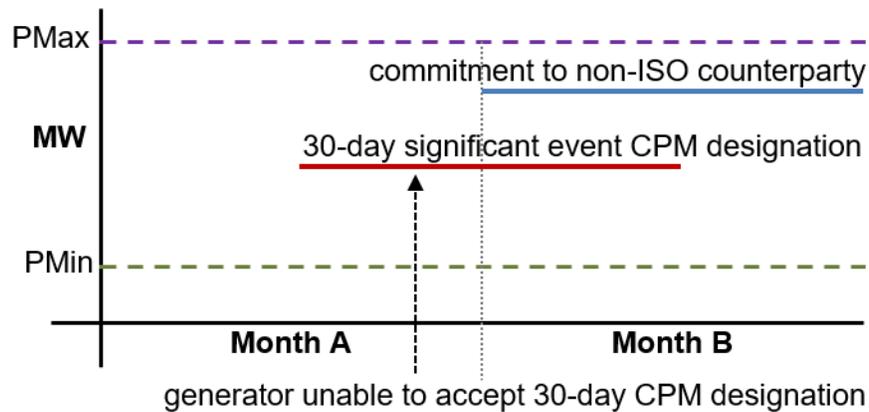
<sup>10</sup> ISO business practice manual for reliability requirements, section 12.3.2  
<https://bpmcm.caiso.com/Pages/BPMDetails.aspx?BPM=Reliability%20Requirements>

commitments to non-ISO balancing authorities, cannot be made after the ISO makes a CPM designation, and the ISO proposes to amend the tariff to make this point explicit. Also important to note is that the ISO is not proposing to extend this new flexibility to CPM designations based on RA showing deficiencies; it is limited to significant event and exceptional dispatch CPM designation types, neither of which are allocated to LSEs as CPM credits under ISO tariff section 43A.9. This last point is important: attempting to extend this new flexibility to CPM designations that are based on RA showing deficiencies is either: (1) not necessary because the designated capacity is already counting towards RA obligations through CPM credits; (2) not relevant because the RA showing deadline has already passed. Furthermore, attempting to extend this new flexibility to CPM designations that are based on RA showing deficiencies could result in CPM credit clawbacks, as the ISO would need to reduce the CPM volume to ensure no double counting or double payment. Such clawbacks could unfairly leave specific LSEs short with very little time left to procure. ~~clarify the tariff to forbid resources from taking on new RA obligations after they have accepted a CPM designation if those new RA obligations conflict with the CPM obligations. For example, consider a resource with 100 MW of NQC with no existing RA obligations that accepts a 30-day CPM designation for 80 MW on April 15. Through May 14, that resource would not be allowed to take on additional RA obligations that exceed the 20 MW of remaining NQC. In general, the timing of the RA showings process already addresses this concern. In this example, the RA showing deadlines for May would have already passed by the time the CPM designation occurred. However, in cases of longer-term CPM designations or with availability to serve as RA substitute capacity there potentially could be a concern. Adding minor clarifying language to the tariff to address this possibility will help reinforce the principles that resources voluntarily accepting a CPM designation: (a) will be held to the term of designation they accept; and (b) never will be allowed to sell the same MW of capacity twice.~~

#### 4.2. Reducing the term of significant event CPM designations made to capacity that was not offered into the intramonthly competitive solicitation process, when the designated capacity has already been committed or is unavailable to the ISO

Under current CPM rules, the minimum term for a significant event CPM designation is 30 days. Because of this rule, a resource scheduling coordinator may have to reject a mid-month significant event CPM designation because the designated capacity has an existing commitment or is unavailable for the following month and, as such, the resource scheduling coordinator is not able to accept a 30-day minimum designation term. For example, figure 2 below (which illustrates the status quo) shows a resource that is unable to accept a 30-day significant event CPM designation beginning in the middle of month A, due to a commitment to a non-ISO counterparty beginning in month B. As demonstrated by this example, the resource has available capacity in month A, but the ISO is unable to access this capacity through a significant event CPM designation. Thus, the minimum term rule can prevent, and has in fact prevented, the ISO from accessing immediately needed (and immediately available) capacity.

**Figure 2:** status quo: resource unable to accept 30-day significant event CPM designation

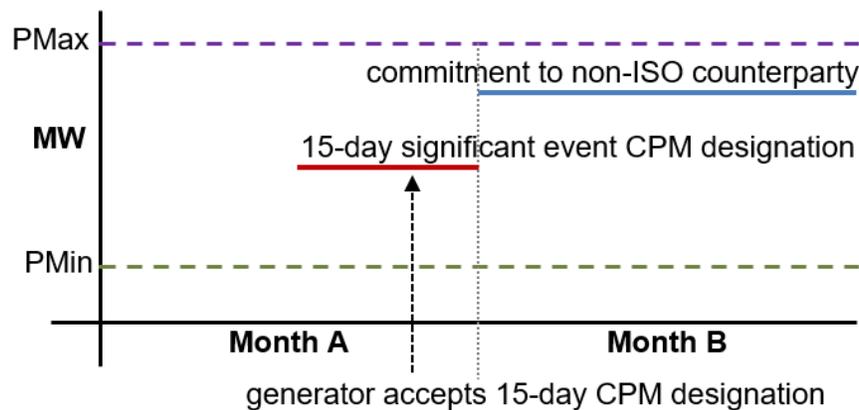


To address this problem, the ISO proposes to give resources flexibility to voluntarily accept significant event CPM designations for less than 30 days at the discretion of the resource scheduling coordinator, [when such designations are made to capacity that was not offered into the intramonthly competitive solicitation process](#).<sup>11</sup> For example, figure 3 (which illustrates proposal 4.2) shows the same resource as shown in figure 2, but with the flexibility to accept a 15-day significant event CPM designation. In practice, the ISO would continue to offer the resource a full-term designation. With proposal 4.2 implemented, however, the resource would have the flexibility to respond to the ISO with a request for a shorter term, and the ISO would have the authority to designate based on that shorter term – as requested by the resource scheduling coordinator. Importantly, the term would be continuous. For example, the resource would not be allowed to request two discontinuous 10-day terms that sum to 20 days. Also important, the term and MW value(s) associated with the significant event CPM award would be frozen once the designation is made. In other words, after the CPM designation is made and accepted, the resource would not be allowed to ask the ISO for a subsequent modification to the CPM, [except as permitted by proposal 4.1 above](#). The ISO understands that in some instances a resource’s election of a designation term less than 30 days could mean that the resource is not able to fully meet the significant event. For example, the significant event might be expected to last for 20 days but a resource might request a 15-day designation. This would leave the ISO with five days of the significant event uncovered by the needed capacity. To minimize the likelihood of this happening, when making significant event CPM designations to capacity not offered to the intra-monthly CSP, the ISO will reserve the right to retract the offer of CPM designation to capacity that cannot meet the minimum needs posed by the significant event in favor of other capacity that can meet the minimum needs. If there is

<sup>11</sup> In the CPM enhancements track 1 stakeholder initiative, the ISO never intended to consider allowing for shorter term significant event CPM designations made through the intramonthly competitive solicitation process (CSP), which has binding offer terms. The ISO’s intention with proposal 4.2 was to allow for shorter term significant event CPM designations, only when such designations are made to capacity that was not offered in the intramonthly CSP. Based on stakeholder feedback the ISO understands that this intention was not clear in either the straw proposal or the draft final proposal. Through these incremental edits the ISO is now making this point explicit.

still insufficient capacity to meet the minimum CPM significant event needs, then the ISO would have the discretion to re-offer the CPM designation to the capacity that is only partially available to meet the CPM need. This approach is consistent with current ISO tariff section 43A.4.2.1, which states: “In the event that there is insufficient capacity to meet the minimum designation criteria from both resources offered into the CSP and resources not offered into the CSP, then the CAISO may reassess and lower the minimum criteria.” The rationale of this approach is that partially meeting the CPM need is better than not meeting the need at all. Further, because the CPM term will be tailored to the resource’s availability, it only will receive CPM capacity payments for the time it is available.

*Figure 3: proposal 4.2: resource has flexibility to accept 15-day significant event CPM designation*



### 4.3. CPM reporting via OASIS

Today, the ISO has a tariff obligation to post a CPM designation report to its website after making CPM designations.<sup>12</sup> For each designated resource the report must include (among other requirements) the resource name, the amount of CPM capacity awarded, the type of designation, the term of the designation, a reason for the designation and the accepted offer price. For example, in October 2021, the ISO published a CPM designation report listing eight resources that the ISO designated for a significant event.<sup>13</sup> A screenshot of this report is pasted below in figure 4.

<sup>12</sup> ISO tariff section 43A.6.2

<http://www.caiso.com/Documents/Section43A-CapacityProcurementMechanism-asof-Apr22-2022.pdf>

CPM designation reports are posted on the ISO’s website at the following location:

<https://www.caiso.com/Pages/documentsbygroup.aspx?GroupID=33EB5656-7056-4B8E-87B2-3EA3D816DA62>

<sup>13</sup> October 2021 Significant Event CPM Designations Report

<https://www.caiso.com/Documents/October2021SignificantEventCPMReport.pdf>

Figure 4: Screenshot of October 2021 Significant Event CPM Designations Report

**October 2021 Significant Event Capacity Procurement Mechanism Designations Report**

**Designation Summary:**

In October 2021, the California ISO issued Significant Event Capacity Procurement Mechanism (CPM) designations to multiple generating units. The designations' effective dates are listed in the table below and have a 30-day term. Prior designations have been included in a previous report.

**CPM Significant Event Designations**

**Amount and Cost:**

Resource ID	CPM MWs	Designated Start Date	CPM Type	Price \$/kW-mon	Tac Area
OMAR_2_UNIT_1	2.32	10/1/2021	SIG EVT	6.31	SYS
OMAR_2_UNIT_2	2.12	10/1/2021	SIG EVT	6.31	SYS
OMAR_2_UNIT_3	2	10/1/2021	SIG EVT	6.31	SYS
OMAR_2_UNIT_4	2	10/1/2021	SIG EVT	6.31	SYS
SYCAMR_2_UNIT_1	3	10/1/2021	SIG EVT	6.31	SYS
SYCAMR_2_UNIT_2	8	10/1/2021	SIG EVT	6.31	SYS
JAWBNE_2_SRWWD2	2.36	10/1/2021	SIG EVT	6.31	SYS
GATEWT_2_GESBT1	5	10/1/2021	SIG EVT	6.31	SYS

**Reason for CPM Significant Event Designations:**

The California ISO (ISO) issued CPM Significant Event designations to the resources listed above to address a CPM Significant Event. A CPM Significant Event is "a substantial event, or a combination of events, that is determined by the CAISO to either result in a material difference from what was assumed in the resource adequacy program for purposes of determining the Resource Adequacy Capacity requirements, or produce a material change in system conditions or in CAISO Controlled Grid operations, that causes, or threatens to cause, a failure to meet Reliability Criteria absent the recurring use of a non-Resource Adequacy resource(s) on a prospective basis."

The ISO proposes to adjust its tariff language to allow for more efficient CPM designation reporting. More specifically, the ISO proposes to meet its CPM designation reporting obligations through its open access same-time information system (OASIS), which already receives CPM designation information from the ISO’s CIRA application. As part of this proposal, the ISO plans to remove the tariff requirement (under section 43A.6.2) for the ISO to post a market notice when the CPM designation report is available. To be clear, the ISO would still be obligated to post an initial market notice, as stated in ISO tariff section 43A.6.1 and as explained below in proposal 4.4. Figure 5 below shows what an OASIS-produced CPM designation report might look like.

Figure 5: Preliminary Mock-Up of OASIS CPM Designation Report

RESOURCE_ID	RESOURCE_NAME	PERIOD_TYPE	CPM_TYPE	CPM_MW	CPM_PRICE	START_DATE	END_DATE	DURATION	DESIGNATION_DETAILS
CALBCH_1_TEST	California Beach	INTRAMONTHLY	SIG EVT	60	6310	6/1/2021	7/1/2021	30	Significat Event CPM for Summer 2021
CALHLS_1_TEST	California Hills	INTRAMONTHLY	ED	100	6310	9/1/2021	10/31/2021	60	Exceptional Dispatch CPM to mitigate a local reliability need in the Hubmoldt area

#### 4.4. CPM market notices

Today, the ISO has a tariff obligation to post market notices within two business days of making a CPM designation.<sup>14</sup> These notices include essential information about the designation, including which resource received a designation, how much capacity was designated, and the price of the designation. The ISO proposes to extend the CPM designation market notice deadline from two business days to five business days. The two business day requirement has posed a challenge for the ISO to complete all of the requisite activities in a timely manner. The ISO's proposal will ensure the ISO has sufficient time to collect the information needed for the market notice, undertake the proper reviews, obtain necessary approvals, and issue the market notice in a timely manner. For example, when the ISO makes an exceptional dispatch CPM designation (which can happen anytime a reliability need occurs), the ISO must quickly take several actions, including the following: a.) confirming the MWs needed; b.) confirming the MWs that responded to the dispatch; c.) confirming the reason for the exceptional dispatch; d.) drafting a market notice; e.) getting the market notice reviewed and approved by the multiple teams that are involved in the process; and f.) posting the market notice. Extending the CPM designation market notice deadline from two business days to five business days will provide ISO staff with adequate time to accurately and effectively fulfill its tariff obligation.

#### 4.5. CPM notifications to scheduling coordinators

The ISO proposes enhancements to the CIRA application to make the resource scheduling coordinator contact information visible to the resource's scheduling coordinator and editable by the scheduling coordinator. The ISO proposes these enhancements so that CPM designation notifications are sent to the appropriate contacts for the scheduling coordinator receiving a capacity procurement mechanism designation. These changes will likely not require any tariff modifications.

### 5. ISO Responses to Stakeholder Feedback ~~on Straw Proposal~~

The ISO greatly appreciates ~~both~~ the verbal and written feedback it received from stakeholders on ~~both~~ the straw proposal ~~and draft final proposal~~. This stakeholder feedback was the basis for the changes ~~now~~ reflected in ~~proposals 4.1 and 4.2. this draft final proposal.~~

~~Regarding proposal 4.1, More-stakeholder feedback on the draft final proposal prompted ISO staff to allow both significant event CPM designated capacity and exceptional dispatch CPM designated capacity to take on new RA obligations after the CPM designation has been accepted. adjust proposal 4.1 and specify that the ISO be allowed to make mid-term significant event CPM award reductions only when the conflicting capacity commitments are accepted before the significant event CPM award is accepted.~~

~~Regarding proposal 4.2, In addition~~ stakeholder feedback ~~on the straw proposal~~ prompted ISO staff to adjust proposal 4.2 – stating that resources should have the flexibility to accept shorter-term significant

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<sup>14</sup> ISO tariff section 43A.6.1

<http://www.aiso.com/Documents/Section43A-CapacityProcurementMechanism-asof-Apr22-2022.pdf>

event CPM designations at the discretion of the resource scheduling coordinator. By adding the clause “at the discretion of the resource scheduling coordinator,” ISO staff ~~has~~ intentionally broadened the scope of proposal 4.2. With this adjustment, shorter-term significant event CPM designations can be used to avoid conflicts with capacity that is not visible to the ISO and can be used to avoid conflicts with planned outages (which are visible to the ISO). [Furthermore, stakeholder questions on the draft final proposal prompted ISO staff to clarify that proposal 4.2 is limited to significant event CPM designations that are made to capacity that was not offered into the intramonthly competitive solicitation process.](#)

In the sections directly below, the ISO provides responses to other stakeholder feedback [and questions related to both ~~on~~ the straw proposal and the draft final proposal](#).

#### [Significant event CPM award reductions and mid-month outage substitutions](#)

The ISO appreciates the question about whether a resource that will be used as a substitute for a mid-month outage qualifies for a mid-month significant event CPM MW reduction under proposal 4.1. In short, the answer is “yes.” Under proposal 4.1, the ISO will have the authority to make a significant event CPM designation, even if the designated capacity will be used as substitute RA capacity in the middle of the CPM term, because the ISO will have the authority to adjust the CPM volume down and then back up, dovetailing with the RA substitution.

#### [Significant event CPM term reductions and mid-month outage substitutions](#)

The ISO appreciates the question about whether a resource that will be used as a substitute for a mid-month outage can be designated for two, discontinuous significant event CPM terms under proposal 4.2. In short, the answer is “no.” As explained directly above, proposal 4.1 addresses resources that will be used a RA substitutes for mid-month outages and allows the ISO to correspondingly adjust the CPM volumes down and back up. Therefore, this particular topic does not need to be addressed in proposal 4.2.

#### [CIRA CSP tool and significant event CPM term reductions](#)

The ISO understands the suggestion to use its competitive solicitation process tool in CIRA, rather than CIDI tickets, to manage resource availability information in the context of proposal 4.2. However, as explained above in this revised draft final proposal, the ISO is proposing to limit proposal 4.2 to significant event CPM designations that are made to capacity that was not offered into the intramonthly competitive solicitation process.

#### [Significant event CPM award reductions reflected in OASIS](#)

The ISO understands the request to have mid-term significant event CPM award (MW) reductions (proposal 4.1) reflected in the OASIS CPM designation report (proposal 4.3). The ISO will explore the feasibility of this request.

### Significant event CPM term reductions reflected in OASIS

The ISO appreciates the request to have significant event CPM term reductions (proposal 4.2) reflected in the OASIS CPM designation report (proposal 4.3). The ISO agrees with this request and will ensure that shorter significant event CPM terms are reflected in the business requirement specifications associated with proposal 4.3.

### CPM final costs in OASIS

The ISO understands the request to have resource-specific CPM final costs reflected in the OASIS CPM designation report (proposal 4.3). However, payments to resources receiving a CPM designation are subject to adjustments for, among other reasons, the Resource Adequacy Availability Incentive Mechanism (RAAIM).<sup>15</sup> Settlements adjustments of this sort are subject to change through the ISO's settlements process which runs for up to 24 months. For this reason, the final costs of a given CPM designation would not be certain for a significant period after the designation term has ended. As a result, this request would require substantial implementation work related to the ISO's settlements system and to OASIS. In addition, there may be concerns from some market participants about the ISO posting resource-specific CPM final costs, which might include settlements adjustments. Accordingly, the ISO proposes to defer this request and may take this issue up in a subsequent track and/or stakeholder initiative.

### OASIS date ranges and consolidated CPM history

The ISO appreciates the request to have a multi-month date range available in OASIS for CPM-related data-pulls. The ISO agrees with this request and will ensure that multi-month date ranges are reflected in the business requirement specifications associated with proposal 4.3.

The ISO also understands the request to have all historical CPM designations reflected in OASIS. However, the ISO is limited on this front by what is in CIRA. Furthermore, attempting to upload historical CPM designations could cause confusion due to important historical nuances associated with particular CPM designations. Accordingly, the ISO cannot accommodate this request, and we instead refer stakeholders to the ISO website, where all of the historical CPM designation reports are posted.

### [CPM designation reporting via OASIS and tariff deadline](#)

The ISO appreciates the question about whether its CPM designation reporting deadline under Tariff section 43A.6.2 will remain the same under proposal 4.3. In short, the answer is "yes." The ISO will not change the existing tariff language pertaining to the deadline for publishing CPM designation information. However, as explained above in proposal 4.3, the ISO plans to meet its CPM designation reporting obligations through its open access same-time information system (OASIS), instead of through a pdf report.

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<sup>15</sup> ISO tariff section 43A

<http://www.caiso.com/Documents/Section43A-CapacityProcurementMechanism-asof-Apr22-2022.pdf>

### CPM designation needs and market notice deadlines

The ISO appreciates the suggestion to establish deadlines for market notices that announce CPM designation needs. The ISO already provides transparency (through market notices) around capacity needs for significant event CPMs where possible and practical. However, the ISO does not believe that it is practical to establish tariff-based deadlines for market notices related to significant event capacity needs.

### Shorter-term exceptional dispatch CPMs

The ISO appreciates the question about whether proposal 4.2 should be applied to exceptional dispatch CPMs, thereby allowing for shorter-term exceptional dispatch CPMs. However, the ISO today is not prevented from exceptionally dispatching resources, even if those resources are subsequently unable to accept a 30-day exceptional dispatch CPM designation. Accordingly, the ISO does not need proposal 4.2 to access shorter-term capacity for exceptional dispatches.

### Significant Event CPMs and supplemental revenues

The ISO appreciates the question about whether supplemental revenues might be applied to significant events and used as an alternative to proposal 4.2. More specifically, the idea would be for the ISO to use supplemental revenues as a resource compensation mechanism for shorter-term significant events, instead of relying on proposal 4.2. However, supplemental revenues are intended to compensate resources who *must* respond to exceptional dispatches but who subsequently decline exceptional dispatch CPM designations. By contrast, the ISO has no authority to make a mandatory significant event dispatch. Therefore, while the ISO appreciates the idea, it believes that proposal 4.2 is a clearer path forward.

### CPM credits

The ISO appreciates the question about whether proposal 4.1 might interfere with CPM credits. More specifically, the concern is that proposal 4.1 might drive a need for CPM credits to be clawed back from LSEs. However, per ISO tariff section 43A.9, CPM credits do not apply to significant event CPM designations.

### Evaluating CSP offers based on term

The ISO appreciates the idea to take term into account when evaluating competitive solicitation process offers. Theoretically, this idea could lead to greater efficiency in backstop procurement and associated ratepayer savings. However, the ISO does not have full visibility into term constraints during the initial evaluation stage of the competitive solicitation process. It is only after the competitive solicitation process that such constraints may be revealed to the ISO. Therefore, the ISO must continue with its current process of evaluating CSP offers without initially taking term into account.

### CPM and Resource Adequacy Availability Incentive Mechanism (RAAIM)

The ISO understands the concern that a resource on outage for the entire term of its CPM designation would still net 5.5% of its CPM revenues. This is because the non-availability charge for a resource providing CPM capacity is based on the difference between the lower bound of the monthly availability standard (94.5%) and the resource's monthly availability percentage, whereas the CPM revenue is based on 100% of the designated capacity.<sup>16</sup> In other words, with respect to ISO capacity payments, a resource providing CPM capacity will always net at least 5.5% of its CPM revenues. This outcome is a byproduct of RAAIM design and the choice not to impose RAAIM charges until a resource falls below the 94.5 percent availability threshold. As long as the ISO allows a resource to perform at some level below 100 percent and still avoid RAAIM non-availability charges, this will still be an issue. Although this question of RAAIM design falls outside the scope of the CPM Enhancements Track 1 initiative, the ISO may examine RAAIM more broadly in the future.

### CPM and Use-Limited Resources

The ISO appreciates the recommendation to take into account resource limitations (and more specifically, use-limitations such as starts per month) when making CPM designations. The ISO tariff does already allow the ISO to take such use-limitations into account when evaluating CSP offers.<sup>17</sup>

### ISO visibility into resource commitments

The ISO appreciates the suggestion to make non-visible resource commitments visible to the ISO and may address this in a subsequent stakeholder initiative.

### T-30 commercial operation deadline

The ISO understands the question about new generation resources that achieve commercial operation after the ISO's T-30 deadline and whether the ISO might allow such resources to become RA. However, the ISO cannot change the T-30 deadline, as there are numerous downstream ISO processes that rely on this timeline. In addition, for purposes of establishing wheeling priorities, non-ISO balancing authority areas that have capacity sourced within the ISO must identify the sources of that capacity by the T-30 deadline. Accordingly, the ISO cannot change the T-30 deadline without also addressing multiple related topics, none of which are in scope for this particular stakeholder initiative.

### CPM and CPUC RA Reform

The ISO understands the recommendation to incorporate CPUC RA reform topics into track 1 of this stakeholder initiative. However, the ISO wants to keep track 1 focused on straight-forward operational

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<sup>16</sup> ISO tariff section 40.9.6.1(a)(2)

<http://www.caiso.com/Documents/Section40-ResourceAdequacyDemonstration-for-SchedulingCoordinatorsintheCaliforniaISOBalancingAuthorityArea-Jun1-2022.pdf>

<sup>17</sup> ISO tariff section 43A.4.2.2

<http://www.caiso.com/Documents/Section43A-CapacityProcurementMechanism-asof-Apr22-2022.pdf>

changes to CPM that can be implemented relatively soon, and so the ISO will address interdependencies with CPUC RA reform topics in a subsequent track and/or stakeholder initiative.

## 6. EIM Governing Body Role

CAISO staff believes that the WEIM Governing Body would not have a role in the decision about this initiative. The role of the WEIM Governing Body with respect to policy initiatives changed on September 23, 2021, when the Board of Governors adopted revisions to the corporate bylaws and the Charter for EIM Governance to implement the Governance Review Committee’s Part Two Proposal. Under the new rules, the Board and the WEIM Governing Body have joint authority over any proposal to change or establish any CAISO tariff rule(s) applicable to the EIM Entity balancing authority areas, EIM Entities, or other market participants within the EIM Entity balancing authority areas, in their capacity as participants in EIM. This scope excludes from joint authority, without limitation, any proposals to change or establish tariff rule(s) applicable only to the CAISO balancing authority area or to the CAISO-controlled grid.

Charter for EIM Governance § 2.2.1. None of the tariff rule changes currently contemplated in this initiative would be “applicable to EIM Entity balancing authority areas, EIM Entities, or other market participants within EIM Entity balancing authority areas, in their capacity as participants in EIM.” Rather, the proposed tariff rules would be applicable “only to the CAISO balancing authority area or to the CAISO-controlled grid.” Accordingly, the matters scheduled for decision fall outside the scope of joint authority.

While the “EIM Governing Body may provide advisory input over proposals to change or establish tariff rules that would apply to the real-time market but are not within the scope of joint authority,” no aspects of this initiative would apply to the real time market. Accordingly, this initiative falls outside of the WEIM Governing Body’s advisory role as well.

Stakeholders are encouraged to submit a response in their written comments to the proposed classification of as described above, particularly if they have concerns or questions.

## 7. Next Steps

The ISO will host a stakeholder call on [December 6, 2022](#) from [9am](#) to [12pm](#) (PST) to discuss this capacity procurement mechanism enhancements track 1 [revised](#) draft final proposal. Written stakeholder comments are due to the ISO by [December 20, 2022](#).



# **Capacity Procurement Mechanism Enhancements**

Track 1 Revised Draft Final Proposal

November 29, 2022

**Market & Infrastructure Policy**

# Capacity Procurement Mechanism Enhancements

## Track 1 Revised Draft Final Proposal

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## 1. Executive Summary

The ISO uses its capacity procurement mechanism (CPM) to address resource adequacy (RA) deficiencies and potential reliability concerns. The ISO can use its CPM authority to address specific circumstances defined by the following six CPM designation types:<sup>1</sup>

1. Insufficient local capacity area resources in an annual or monthly RA plan
2. A collective deficiency in local capacity area resources
3. Insufficient RA resources in a load-serving entity's annual or monthly RA plan
4. A CPM significant event
5. A reliability or operational need for an exceptional dispatch CPM
6. A cumulative deficiency in the total flexible RA capacity included in the annual or monthly flexible RA capacity plans, or in a flexible capacity category in the monthly flexible RA capacity plans

When the ISO makes CPM designations, it relies on capacity willingly offered to the ISO by resource owners. To attract such capacity, the ISO conducts annual, monthly and intra-monthly competitive solicitation processes, into which resource owners may offer their capacity to the ISO at prices up to a soft offer cap, currently set at \$6.31/kw-month.<sup>2</sup> Resource owners may also cost justify offers above the soft offer cap.

The CPM Enhancements stakeholder initiative is comprised of at least two tracks. Track 1 addresses five operational and process enhancement issues, and the ISO is planning to take Track 1 for approval at the March 2023 Board of Governors meeting. Track 2 will re-examine the CPM soft offer cap. It will be started at some point in the future and will likely require a longer stakeholder process than Track 1.

Summary of Track 1 Proposals:

Note: in response to stakeholder feedback on the draft final proposal, the ISO has made adjustments to the first two of the following five proposals, including tariff clarifications associated with the first proposal. For more detail on stakeholder feedback and the ISO's perspective on such feedback, please refer to section 5 of this revised draft final proposal.

1. [Reducing the volume \(MW\) of significant event CPM designations and exceptional dispatch CPM designations when the designated capacity is committed and shown to the ISO as RA capacity:](#) the ISO should be able to make mid-term significant event CPM award reductions if the designated capacity is committed (and shown to the ISO) for an RA contract, reliability must-run (RMR) contract or monthly CPM designation (referred to here as "other capacity commitments"). This will allow capacity designated for significant events to participate in RA

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<sup>1</sup> ISO tariff section 43A.2

<http://www.caiso.com/Documents/Section43A-CapacityProcurementMechanism-asof-Apr22-2022.pdf>

<sup>2</sup> ISO tariff section 43A.4.1.1

<http://www.caiso.com/Documents/Section43A-CapacityProcurementMechanism-asof-Apr22-2022.pdf>

and RMR contracts and accept monthly CPM designations that may begin during the significant event CPM term. The ISO already has this type of authority and flexibility for exceptional dispatch CPM awards.

In conjunction with this proposal and in direct response to stakeholder sentiment that backstop CPM designations should not hinder the fulfillment of forward RA obligations by reducing the pool of potentially available RA capacity, the ISO plans to allow both significant event CPM designated capacity and exceptional dispatch CPM designated capacity to take on new RA obligations after the CPM designation has been accepted. The capacity does not need to have been shown to the ISO as RA before the CPM designation becomes effective. When the capacity designated as CPM takes on a new RA obligation, the ISO will correspondingly reduce the CPM volume to ensure that there is no double counting or double payment. Importantly, the “new RA obligations” referred to above must be shown to the ISO as RA capacity through the regular RA showing process. Non-RA commitments, such as commitments to non-ISO balancing authorities, cannot be made after the ISO makes a CPM designation, and the ISO proposes to amend the tariff to make this point explicit. Also important to note is that the ISO is not proposing to extend this new flexibility for CPM designations based on RA showing deficiencies; it is limited to significant event and exceptional dispatch CPM designation types.

2. [Reducing the term of significant event CPM designations made to capacity that was not offered into the intramonthly competitive solicitation process, when the designated capacity has already been committed or is unavailable to the ISO:](#) the ISO proposes to allow resource scheduling coordinators to voluntarily accept significant event CPM designations for less than 30 days at the resource scheduling coordinator’s discretion, when such designations are made to capacity that was not offered into the intramonthly competitive solicitation process. For example, the resource scheduling coordinator may have sold the capacity for the following month to a counterparty outside the ISO, or the resource may have a planned outage in the following month. This proposal will allow resource scheduling coordinators with capacity that is unavailable to the ISO for the following month to accept mid-month shorter-term significant event CPM designations, providing the ISO with more immediate access to available capacity. This proposal is similar to proposal 4.1, but it allows for shorter terms (instead of reduced volumes) and also addresses commitments that are not currently visible to the ISO (such as commitments to counterparties outside the ISO), whereas proposal 4.1 deals exclusively with commitments that are visible to the ISO at the time of designation.
3. [CPM reporting via OASIS:](#) the ISO proposes to meet its obligation to post CPM designation reports (tariff section 43A.6.2) through its open access same-time information system (OASIS), which now receives CPM designation information directly from the ISO’s customer interface for resource adequacy (CIRA) application.
4. [CPM market notices:](#) the ISO proposes to extend the CPM designation market notice deadline from two business days to five business days. This will ensure the ISO has sufficient time to

collect the information needed for the market notice, undertake the proper reviews, obtain necessary approvals, and issue the market notice in a timely manner.

5. [CPM notifications to scheduling coordinators](#): the ISO proposes to make the resource scheduling coordinator contact information directly visible and editable in CIRA to avoid CPM designation notifications being sent to an outdated contact.

## 2. Stakeholder Process

The Capacity Procurement Mechanism (CPM) Enhancements stakeholder initiative is comprised of at least two tracks. Track 1 addresses operational and process enhancement issues and is the focus of this revised draft final proposal. As shown in Table 1 below, the ISOs plans to seek Track 1 approval at the March 2023 Board of Governors meeting and implement Track 1 in 2023. Track 2 will re-examine the CPM soft offer cap and will likely require a longer stakeholder process. Track 2 will have a separate Board of Governors presentation and a later implementation timeline.

**Table 1: CPM Enhancements Stakeholder Initiative Schedule**

Date	Track 1 Milestone
July 28, 2022	Publish straw proposal
August 4, 2022	Stakeholder call on straw proposal
August 18, 2022	Due date for stakeholder comments on straw proposal
September 16, 2022	Publish draft final proposal
September 23, 2022	Stakeholder call on draft final proposal
October 7, 2022	Due date for stakeholder comments on draft final proposal
November 29, 2022	Publish revised draft final proposal
December 6, 2022	Stakeholder call: revised draft final proposal
December 20, 2022	Due date for stakeholder comments on revised draft final proposal
January 12, 2023	Publish draft tariff language and final proposal
January 26, 2023	Stakeholder call: draft tariff language and final proposal
February 9, 2023	Due date for stakeholder comments on draft tariff language
March 23, 2023	Board of Governors presentation
2023	FERC filing and implementation

## 3. Background on CPM

The ISO uses its capacity procurement mechanism (CPM) to address RA deficiencies and other potential reliability concerns. The ISO's use of its CPM authority is often referred to as "backstop" procurement, required when sufficient capacity has not been procured through the RA program. The ISO's backstop procurement authority also includes reliability must-run (RMR) contracts, which the ISO uses to retain

resources that would otherwise retire but the ISO determines are needed to maintain reliable grid operations based on the results of technical studies and analyses.<sup>3</sup> The ISO can use its CPM authority to procure capacity that is not committed RA capacity or RMR capacity to address specific circumstances defined by the six CPM designation types listed in Table 2. The ISO does not use RMR authority to backstop RA deficiencies.

**Table 2: CPM Designation Types<sup>4</sup>**

#	CPM Designation Type
1	Insufficient local capacity area resources in an annual or monthly RA plan
2	A collective deficiency in local capacity area resources
3	Insufficient RA resources in an LSE's annual or monthly RA plan
4	A CPM significant event
5	A reliability or operational need for an exceptional dispatch CPM
6	A cumulative deficiency in the total flexible RA capacity included in the annual or monthly flexible RA capacity plans, or in a flexible capacity category in the monthly flexible RA capacity plans

When the ISO needs to make CPM designations, it relies on capacity willingly offered to the ISO by resource owners. To attract such capacity, the ISO conducts annual, monthly and intra-monthly competitive solicitation processes, in which resource owners may offer their capacity to the ISO at prices up to a soft offer cap, currently set at \$6.31/kw-month. Any offers above the soft offer cap must be cost-justified at FERC to recover up to a resource-specific cost of service rate.<sup>5</sup>

The existing soft offer cap of \$6.31/kw-month was set during the ISO's capacity procurement mechanism replacement stakeholder initiative and was based on a subset of combined cycle fixed costs, as published by the California Energy Commission (CEC).<sup>6</sup> The ISO has a tariff obligation to open a stakeholder initiative every four years (at the latest) to examine the soft offer cap and consider whether

<sup>3</sup> ISO tariff section 41

<http://www.caiso.com/Documents/Section41-Procurement-RMRResources-asof-Sep28-2019.pdf>

<sup>4</sup> ISO tariff section 43A.2

<http://www.caiso.com/Documents/Section43A-CapacityProcurementMechanism-asof-Apr22-2022.pdf>

<sup>5</sup> ISO tariff section 43A.4.1.1.1

<http://www.caiso.com/Documents/Section43A-CapacityProcurementMechanism-asof-Apr22-2022.pdf>

<sup>6</sup> ISO's Capacity Procurement Mechanism Replacement stakeholder initiative:

<http://www.caiso.com/Pages/documentsbygroup.aspx?GroupID=bfe609ff-a9a1-4828-bf01-51a495bef7e2>

The current Soft Offer Cap of \$6.31/kw-month is the monthly equivalent of \$75.67/kw-year, which is equal to 120% x \$63.06/kw-year. \$63.06/kw-year is the levelized going-forward fixed cost (fixed O&M, ad valorem taxes, insurance) of a 550 MW advanced combined cycle resource with duct firing, as published by the California Energy Commission in its 2014-2015 study "Cost of New Renewable and Fossil Generation in California."

it needs to be changed. In its capacity procurement mechanism soft offer cap stakeholder initiative, the ISO met that tariff obligation by considering updated combined cycle fixed costs published by the CEC in May 2019.<sup>7</sup> In Track 2 of this CPM Enhancements stakeholder initiative and in accordance with its tariff obligation, the ISO plans to re-examine the soft offer cap and consider other potential enhancements.

The ISO's capacity procurement mechanism process starts with a competitive solicitation process where resource owners submit offers through the ISO's customer interface for resource adequacy (CIRA) application. The ISO's submission window requires offers to be submitted prior to any announcement of whether capacity might be needed by the ISO for a CPM designation. After offers are submitted and the adjustment window is closed, the ISO validates the offers to ensure the capacity is uncontracted. If there is a CPM need, the ISO will then select resources that meet the designation criteria at the lowest total cost. If there are insufficient offers, the ISO can offer CPM designations at the soft offer cap to capacity not offered into the competitive solicitation process.

As mentioned above, resource owners may offer their capacity to the ISO at prices above the soft offer cap, but they must cost-justify such offers at FERC based on the resource-specific going forward fixed costs, *i.e.*, fixed operation and maintenance costs, ad valorem taxes and insurance. There are two important differences between the calculation of the above-cap cost of service rate and derivation of the soft offer cap: a.) the cost of service rate is based on resource-specific inputs, whereas the soft offer cap is based on a generic 550 MW advanced combined cycle resource with duct firing; and b.) the cost of service rate calculation does not include a 20% adder, whereas the soft offer cap derivation does include a 20% adder. These differences were reflected in a May 2022 compliance filing that the ISO submitted to FERC, finalizing the above-cap cost of service rate calculation methodology.<sup>8</sup>

## 4. Proposal

In Track 1, the ISO proposes to address five CPM operational and process issues, as summarized and detailed below:

- Proposal 4.1 addresses significant event CPM awards and mid-term reductions in volume (MW) required by the ISO. In addition, proposal 4.1 allows both significant event CPM designated capacity and exceptional dispatch CPM designated capacity to take on new RA obligations after the CPM designation has been accepted.

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<sup>7</sup> ISO's Capacity Procurement Mechanism Soft Offer Cap stakeholder initiative:

<https://stakeholdercenter.caiso.com/StakeholderInitiatives/Capacity-procurement-mechanism-soft-offer-cap>

Estimated Cost of New Utility-Scale Generation in California: 2018 Update, CEC, May 2019

<https://www.energy.ca.gov/sites/default/files/2021-06/CEC-200-2019-005.pdf>

<sup>8</sup> Docket ER20-1075, ISO compliance filing to FERC, 5/23/22

<https://www.caiso.com/Documents/May23-2022-ComplianceFiling-CapacityProcurementMechanism-CPM-above-SoftOfferCap-ER20-1075.pdf>

- Proposal 4.2 addresses significant event CPM awards and reductions in term at the discretion of the resource scheduling coordinator, specifically for significant event CPM designations made to capacity that was not offered into the intramonthly competitive solicitation process.
- Proposal 4.3 addresses CPM reporting.
- Proposal 4.4 addresses CPM market notices.
- Proposal 4.5 addresses CPM notifications to scheduling coordinators.

#### 4.1. Reducing the volume (MW) of significant event CPM designations and exceptional dispatch CPM designations when the designated capacity is committed and shown to the ISO as RA capacity.

The ISO proposes that it have the ability to reduce significant event CPM awards as follows: if capacity that receives a significant event designation is shown as RA capacity or receives a monthly CPM designation or is under an RMR contract as of a certain date, then the significant event CPM designation shall be reduced by the amount of the new RA capacity, monthly CPM designation, or RMR contract (referred to here as “other capacity commitments”) from that date through the rest of the CPM designation term. This proposal will allow capacity designated for significant events to participate in RA and RMR contracts and accept monthly CPM designations that may begin during the term of the significant event CPM designation. The ISO already has this type of authority for exceptional dispatch CPM awards (as explained and illustrated below), and it is appropriate to extend such authority to include significant event CPM awards. Like exceptional dispatch CPMs, significant event CPMs can span multiple calendar months, and the resource’s RA Capacity, RMR status and designations for monthly CPM awards may change during the term of the significant event CPM.

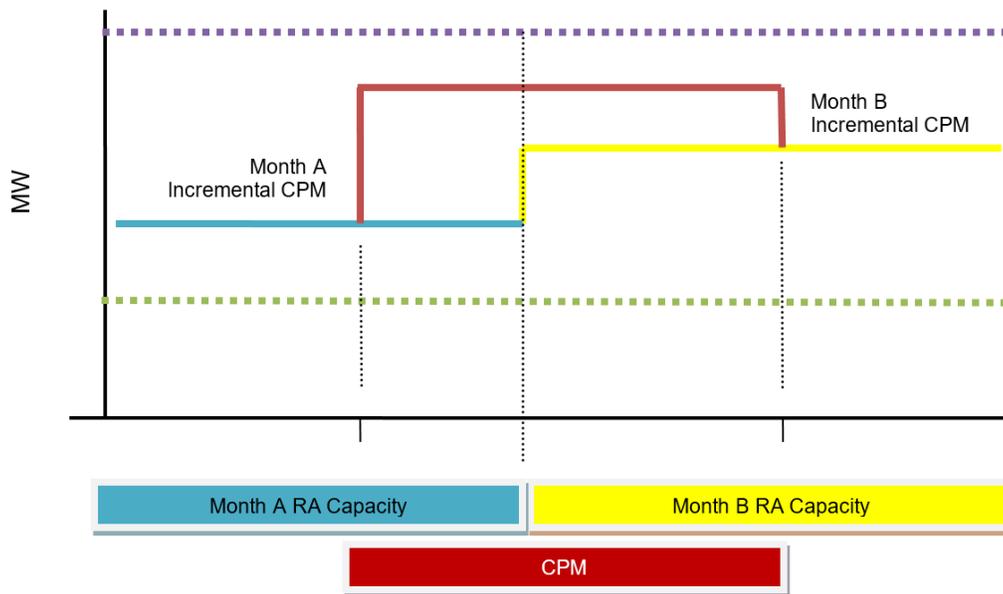
The ISO today has the authority to make mid-term reductions to exceptional dispatch CPM awards when the designated capacity receives an RA, monthly CPM, or RMR contract.<sup>9</sup> Figure 1 below shows a resource with RA contracts in months A and B and a 30-day exceptional dispatch CPM award that includes both months. As shown in the chart, the RA volumes increase from month A to month B, and the CPM award is decreased accordingly, keeping the total capacity awards unchanged and at the required level.

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<sup>9</sup> ISO Tariff Section 43A.2.5.2.4

<http://www.caiso.com/Documents/Section43A-CapacityProcurementMechanism-asof-Apr22-2022.pdf>

**Figure 1: Illustration of ISO’s existing authority related to Exceptional Dispatch CPM Awards<sup>10</sup>**



The ISO proposes to apply this same logic to significant event CPM awards, providing the ISO with the flexibility to make a CPM designation that can volumetrically change from one calendar month to the next, if warranted by changes in RA, CPM, or RMR volumes. For example, consider a resource with 100 MW of net qualifying capacity across the year. Next, consider that this particular resource has shown to the ISO 40 MW of RA in month A and 70 MW of RA in month B. Finally, consider that the ISO wants to designate this resource for a 50 MW significant event CPM award beginning in the middle of month A. With proposal 4.1 implemented, the ISO will be able to move forward with such a CPM designation, because it will have the authority to decrease the CPM award from 50 MW to 20 MW in month B, corresponding to the increase in the shown RA from 40 MW to 70 MW. This will allow the ISO to take full advantage of uncontracted capacity in a specific calendar month, even if that uncontracted volume is not available for a full 30 days. Without this proposed flexibility, the ISO will remain unable to make significant event CPM designations for capacity it needs immediately if such capacity would become RA, RMR, or monthly CPM capacity during the term of the CPM designation.

In conjunction with proposal 4.1 and in direct response to stakeholder sentiment that backstop CPM designations should not hinder the fulfillment of forward RA obligations by reducing the pool of potentially available RA capacity, the ISO plans to allow both significant event CPM designated capacity and exceptional dispatch CPM designated capacity to take on new RA obligations after the CPM designation has been accepted. The capacity does not need to have been shown to the ISO as RA before the CPM designation becomes effective. When the capacity designated as CPM takes on a new RA obligation, the ISO will correspondingly reduce the CPM volume to ensure that there is no double counting or double payment. Importantly, the “new RA obligations” referred to above must be shown to the ISO as RA capacity through the regular RA showing process. Non-RA commitments, such as

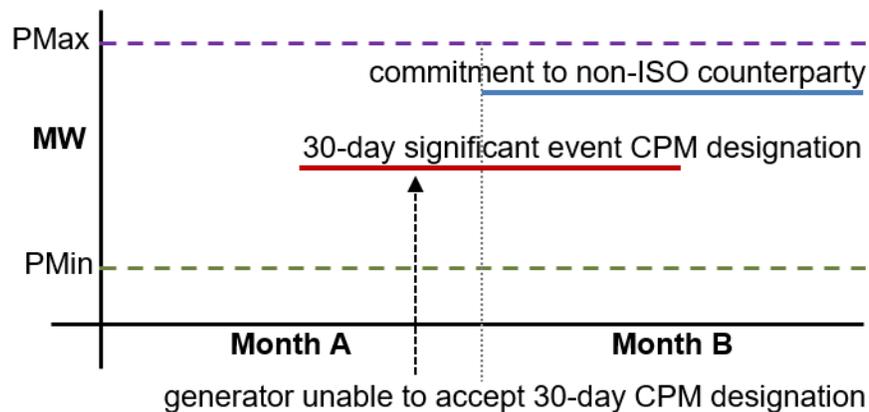
<sup>10</sup> ISO business practice manual for reliability requirements, section 12.3.2  
<https://bpmcm.caiso.com/Pages/BPMDetails.aspx?BPM=Reliability%20Requirements>

commitments to non-ISO balancing authorities, cannot be made after the ISO makes a CPM designation, and the ISO proposes to amend the tariff to make this point explicit. Also important to note is that the ISO is not proposing to extend this new flexibility to CPM designations based on RA showing deficiencies; it is limited to significant event and exceptional dispatch CPM designation types, neither of which are allocated to LSEs as CPM credits under ISO tariff section 43A.9. This last point is important: attempting to extend this new flexibility to CPM designations that are based on RA showing deficiencies is either: (1) not necessary because the designated capacity is already counting towards RA obligations through CPM credits; (2) not relevant because the RA showing deadline has already passed. Furthermore, attempting to extend this new flexibility to CPM designations that are based on RA showing deficiencies could result in CPM credit clawbacks, as the ISO would need to reduce the CPM volume to ensure no double counting or double payment. Such clawbacks could unfairly leave specific LSEs short with very little time left to procure.

#### 4.2. Reducing the term of significant event CPM designations made to capacity that was not offered into the intramonthly competitive solicitation process, when the designated capacity has already been committed or is unavailable to the ISO

Under current CPM rules, the minimum term for a significant event CPM designation is 30 days. Because of this rule, a resource scheduling coordinator may have to reject a mid-month significant event CPM designation because the designated capacity has an existing commitment or is unavailable for the following month and, as such, the resource scheduling coordinator is not able to accept a 30-day minimum designation term. For example, figure 2 below (which illustrates the status quo) shows a resource that is unable to accept a 30-day significant event CPM designation beginning in the middle of month A, due to a commitment to a non-ISO counterparty beginning in month B. As demonstrated by this example, the resource has available capacity in month A, but the ISO is unable to access this capacity through a significant event CPM designation. Thus, the minimum term rule can prevent, and has in fact prevented, the ISO from accessing immediately needed (and immediately available) capacity.

*Figure 2: status quo: resource unable to accept 30-day significant event CPM designation*

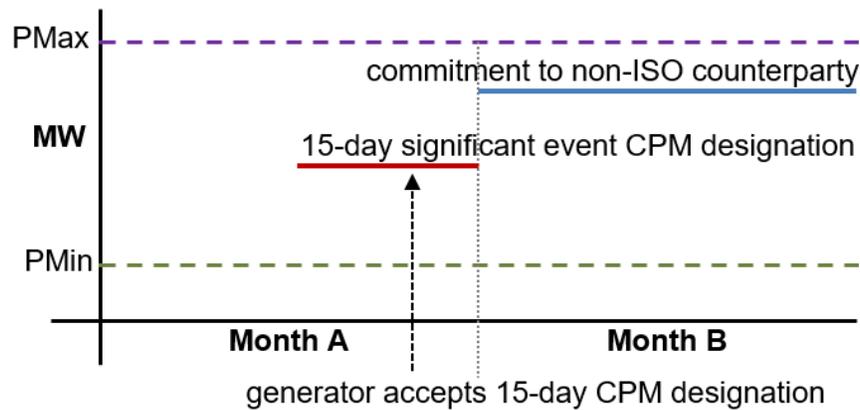


To address this problem, the ISO proposes to give resources flexibility to voluntarily accept significant event CPM designations for less than 30 days at the discretion of the resource scheduling coordinator, when such designations are made to capacity that was not offered into the intramonthly competitive solicitation process.<sup>11</sup> For example, figure 3 (which illustrates proposal 4.2) shows the same resource as shown in figure 2, but with the flexibility to accept a 15-day significant event CPM designation. In practice, the ISO would continue to offer the resource a full-term designation. With proposal 4.2 implemented, however, the resource would have the flexibility to respond to the ISO with a request for a shorter term, and the ISO would have the authority to designate based on that shorter term – as requested by the resource scheduling coordinator. Importantly, the term would be continuous. For example, the resource would not be allowed to request two discontinuous 10-day terms that sum to 20 days. Also important, the term and MW value(s) associated with the significant event CPM award would be frozen once the designation is made. In other words, after the CPM designation is made and accepted, the resource would not be allowed to ask the ISO for a subsequent modification to the CPM, except as permitted by proposal 4.1 above. The ISO understands that in some instances a resource’s election of a designation term less than 30 days could mean that the resource is not able to fully meet the significant event. For example, the significant event might be expected to last for 20 days but a resource might request a 15-day designation. This would leave the ISO with five days of the significant event uncovered by the needed capacity. To minimize the likelihood of this happening, when making significant event CPM designations to capacity not offered to the intra-monthly CSP, the ISO will reserve the right to retract the offer of CPM designation to capacity that cannot meet the minimum needs posed by the significant event in favor of other capacity that can meet the minimum needs. If there is still insufficient capacity to meet the minimum CPM significant event needs, then the ISO would have the discretion to re-offer the CPM designation to the capacity that is only partially available to meet the

<sup>11</sup> In the CPM enhancements track 1 stakeholder initiative, the ISO never intended to consider allowing for shorter term significant event CPM designations made through the intramonthly competitive solicitation process (CSP), which has binding offer terms. The ISO’s intention with proposal 4.2 was to allow for shorter term significant event CPM designations, only when such designations are made to capacity that was not offered in the intramonthly CSP. Based on stakeholder feedback the ISO understands that this intention was not clear in either the straw proposal or the draft final proposal. Through these incremental edits the ISO is now making this point explicit.

CPM need. This approach is consistent with current ISO tariff section 43A.4.2.1, which states: “In the event that there is insufficient capacity to meet the minimum designation criteria from both resources offered into the CSP and resources not offered into the CSP, then the CAISO may reassess and lower the minimum criteria.” The rationale of this approach is that partially meeting the CPM need is better than not meeting the need at all. Further, because the CPM term will be tailored to the resource’s availability, it only will receive CPM capacity payments for the time it is available.

*Figure 3: proposal 4.2: resource has flexibility to accept 15-day significant event CPM designation*



### 4.3. CPM reporting via OASIS

Today, the ISO has a tariff obligation to post a CPM designation report to its website after making CPM designations.<sup>12</sup> For each designated resource the report must include (among other requirements) the resource name, the amount of CPM capacity awarded, the type of designation, the term of the designation, a reason for the designation and the accepted offer price. For example, in October 2021, the ISO published a CPM designation report listing eight resources that the ISO designated for a significant event.<sup>13</sup> A screenshot of this report is pasted below in figure 4.

<sup>12</sup> ISO tariff section 43A.6.2

<http://www.caiso.com/Documents/Section43A-CapacityProcurementMechanism-asof-Apr22-2022.pdf>

CPM designation reports are posted on the ISO’s website at the following location:

<https://www.caiso.com/Pages/documentsbygroup.aspx?GroupID=33EB5656-7056-4B8E-87B2-3EA3D816DA62>

<sup>13</sup> October 2021 Significant Event CPM Designations Report

<https://www.caiso.com/Documents/October2021SignificantEventCPMReport.pdf>

**Figure 4: Screenshot of October 2021 Significant Event CPM Designations Report**

**October 2021 Significant Event Capacity Procurement Mechanism Designations Report**

**Designation Summary:**

In October 2021, the California ISO issued Significant Event Capacity Procurement Mechanism (CPM) designations to multiple generating units. The designations' effective dates are listed in the table below and have a 30-day term. Prior designations have been included in a previous report.

**CPM Significant Event Designations**

**Amount and Cost:**

Resource ID	CPM MWs	Designated Start Date	CPM Type	Price \$/kW-mon	Tac Area
OMAR_2_UNIT_1	2.32	10/1/2021	SIG EVT	6.31	SYS
OMAR_2_UNIT_2	2.12	10/1/2021	SIG EVT	6.31	SYS
OMAR_2_UNIT_3	2	10/1/2021	SIG EVT	6.31	SYS
OMAR_2_UNIT_4	2	10/1/2021	SIG EVT	6.31	SYS
SYCAMR_2_UNIT_1	3	10/1/2021	SIG EVT	6.31	SYS
SYCAMR_2_UNIT_2	8	10/1/2021	SIG EVT	6.31	SYS
JAWBNE_2_SRWWD2	2.36	10/1/2021	SIG EVT	6.31	SYS
GATEWT_2_GESBT1	5	10/1/2021	SIG EVT	6.31	SYS

**Reason for CPM Significant Event Designations:**

The California ISO (ISO) issued CPM Significant Event designations to the resources listed above to address a CPM Significant Event. A CPM Significant Event is "a substantial event, or a combination of events, that is determined by the CAISO to either result in a material difference from what was assumed in the resource adequacy program for purposes of determining the Resource Adequacy Capacity requirements, or produce a material change in system conditions or in CAISO Controlled Grid operations, that causes, or threatens to cause, a failure to meet Reliability Criteria absent the recurring use of a non-Resource Adequacy resource(s) on a prospective basis."

The ISO proposes to adjust its tariff language to allow for more efficient CPM designation reporting. More specifically, the ISO proposes to meet its CPM designation reporting obligations through its open access same-time information system (OASIS), which already receives CPM designation information from the ISO’s CIRA application. As part of this proposal, the ISO plans to remove the tariff requirement (under section 43A.6.2) for the ISO to post a market notice when the CPM designation report is available. To be clear, the ISO would still be obligated to post an initial market notice, as stated in ISO tariff section 43A.6.1 and as explained below in proposal 4.4. Figure 5 below shows what an OASIS-produced CPM designation report might look like.

**Figure 5: Preliminary Mock-Up of OASIS CPM Designation Report**

RESOURCE_ID	RESOURCE_NAME	PERIOD_TYPE	CPM_TYPE	CPM_MW	CPM_PRICE	START_DATE	END_DATE	DURATION	DESIGNATION_DETAILS
CALBCH_1_TEST	California Beach	INTRAMONTHLY	SIG EVT	60	6310	6/1/2021	7/1/2021	30	Significat Event CPM for Summer 2021
CALHLS_1_TEST	California Hills	INTRAMONTHLY	ED	100	6310	9/1/2021	10/31/2021	60	Exceptional Dispatch CPM to mitigate a local reliability need in the Hubmoldt area

#### 4.4. CPM market notices

Today, the ISO has a tariff obligation to post market notices within two business days of making a CPM designation.<sup>14</sup> These notices include essential information about the designation, including which resource received a designation, how much capacity was designated, and the price of the designation. The ISO proposes to extend the CPM designation market notice deadline from two business days to five business days. The two business day requirement has posed a challenge for the ISO to complete all of the requisite activities in a timely manner. The ISO's proposal will ensure the ISO has sufficient time to collect the information needed for the market notice, undertake the proper reviews, obtain necessary approvals, and issue the market notice in a timely manner. For example, when the ISO makes an exceptional dispatch CPM designation (which can happen anytime a reliability need occurs), the ISO must quickly take several actions, including the following: a.) confirming the MWs needed; b.) confirming the MWs that responded to the dispatch; c.) confirming the reason for the exceptional dispatch; d.) drafting a market notice; e.) getting the market notice reviewed and approved by the multiple teams that are involved in the process; and f.) posting the market notice. Extending the CPM designation market notice deadline from two business days to five business days will provide ISO staff with adequate time to accurately and effectively fulfill its tariff obligation.

#### 4.5. CPM notifications to scheduling coordinators

The ISO proposes enhancements to the CIRA application to make the resource scheduling coordinator contact information visible to the resource's scheduling coordinator and editable by the scheduling coordinator. The ISO proposes these enhancements so that CPM designation notifications are sent to the appropriate contacts for the scheduling coordinator receiving a capacity procurement mechanism designation. These changes will likely not require any tariff modifications.

### 5. ISO Responses to Stakeholder Feedback

The ISO greatly appreciates the verbal and written feedback it received from stakeholders on both the straw proposal and draft final proposal. This stakeholder feedback was the basis for the changes now reflected in proposals 4.1 and 4.2.

Regarding proposal 4.1, stakeholder feedback on the draft final proposal prompted ISO staff to allow both significant event CPM designated capacity and exceptional dispatch CPM designated capacity to take on new RA obligations after the CPM designation has been accepted.

Regarding proposal 4.2, stakeholder feedback on the straw proposal prompted ISO staff to adjust proposal 4.2 – stating that resources should have the flexibility to accept shorter-term significant event CPM designations at the discretion of the resource scheduling coordinator. By adding the clause “at the discretion of the resource scheduling coordinator,” ISO staff intentionally broadened the scope of

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<sup>14</sup> ISO tariff section 43A.6.1

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proposal 4.2. With this adjustment, shorter-term significant event CPM designations can be used to avoid conflicts with capacity that is not visible to the ISO and can be used to avoid conflicts with planned outages (which are visible to the ISO). Furthermore, stakeholder questions on the draft final proposal prompted ISO staff to clarify that proposal 4.2 is limited to significant event CPM designations that are made to capacity that was not offered into the intramonthly competitive solicitation process.

In the sections directly below, the ISO provides responses to other stakeholder feedback and questions related to both the straw proposal and the draft final proposal.

#### Significant event CPM award reductions and mid-month outage substitutions

The ISO appreciates the question about whether a resource that will be used as a substitute for a mid-month outage qualifies for a mid-month significant event CPM MW reduction under proposal 4.1. In short, the answer is “yes.” Under proposal 4.1, the ISO will have the authority to make a significant event CPM designation, even if the designated capacity will be used as substitute RA capacity in the middle of the CPM term, because the ISO will have the authority to adjust the CPM volume down and then back up, dovetailing with the RA substitution.

#### Significant event CPM term reductions and mid-month outage substitutions

The ISO appreciates the question about whether a resource that will be used as a substitute for a mid-month outage can be designated for two, discontinuous significant event CPM terms under proposal 4.2. In short, the answer is “no.” As explained directly above, proposal 4.1 addresses resources that will be used as RA substitutes for mid-month outages and allows the ISO to correspondingly adjust the CPM volumes down and back up. Therefore, this particular topic does not need to be addressed in proposal 4.2.

#### CIRA CSP tool and significant event CPM term reductions

The ISO understands the suggestion to use its competitive solicitation process tool in CIRA, rather than CIDI tickets, to manage resource availability information in the context of proposal 4.2. However, as explained above in this revised draft final proposal, the ISO is proposing to limit proposal 4.2 to significant event CPM designations that are made to capacity that was not offered into the intramonthly competitive solicitation process.

#### Significant event CPM award reductions reflected in OASIS

The ISO understands the request to have mid-term significant event CPM award (MW) reductions (proposal 4.1) reflected in the OASIS CPM designation report (proposal 4.3). The ISO will explore the feasibility of this request.

#### Significant event CPM term reductions reflected in OASIS

The ISO appreciates the request to have significant event CPM term reductions (proposal 4.2) reflected in the OASIS CPM designation report (proposal 4.3). The ISO agrees with this request and will ensure

that shorter significant event CPM terms are reflected in the business requirement specifications associated with proposal 4.3.

#### CPM final costs in OASIS

The ISO understands the request to have resource-specific CPM final costs reflected in the OASIS CPM designation report (proposal 4.3). However, payments to resources receiving a CPM designation are subject to adjustments for, among other reasons, the Resource Adequacy Availability Incentive Mechanism (RAAIM).<sup>15</sup> Settlements adjustments of this sort are subject to change through the ISO's settlements process which runs for up to 24 months. For this reason, the final costs of a given CPM designation would not be certain for a significant period after the designation term has ended. As a result, this request would require substantial implementation work related to the ISO's settlements system and to OASIS. In addition, there may be concerns from some market participants about the ISO posting resource-specific CPM final costs, which might include settlements adjustments. Accordingly, the ISO proposes to defer this request and may take this issue up in a subsequent track and/or stakeholder initiative.

#### OASIS date ranges and consolidated CPM history

The ISO appreciates the request to have a multi-month date range available in OASIS for CPM-related data-pulls. The ISO agrees with this request and will ensure that multi-month date ranges are reflected in the business requirement specifications associated with proposal 4.3.

The ISO also understands the request to have all historical CPM designations reflected in OASIS. However, the ISO is limited on this front by what is in CIRA. Furthermore, attempting to upload historical CPM designations could cause confusion due to important historical nuances associated with particular CPM designations. Accordingly, the ISO cannot accommodate this request, and we instead refer stakeholders to the ISO website, where all of the historical CPM designation reports are posted.

#### CPM designation reporting via OASIS and tariff deadline

The ISO appreciates the question about whether its CPM designation reporting deadline under Tariff section 43A.6.2 will remain the same under proposal 4.3. In short, the answer is "yes." The ISO will not change the existing tariff language pertaining to the deadline for publishing CPM designation information. However, as explained above in proposal 4.3, the ISO plans to meet its CPM designation reporting obligations through its open access same-time information system (OASIS), instead of through a pdf report.

#### CPM designation needs and market notice deadlines

The ISO appreciates the suggestion to establish deadlines for market notices that announce CPM designation needs. The ISO already provides transparency (through market notices) around capacity

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<sup>15</sup> ISO tariff section 43A

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needs for significant event CPMs where possible and practical. However, the ISO does not believe that it is practical to establish tariff-based deadlines for market notices related to significant event capacity needs.

#### Shorter-term exceptional dispatch CPMs

The ISO appreciates the question about whether proposal 4.2 should be applied to exceptional dispatch CPMs, thereby allowing for shorter-term exceptional dispatch CPMs. However, the ISO today is not prevented from exceptionally dispatching resources, even if those resources are subsequently unable to accept a 30-day exceptional dispatch CPM designation. Accordingly, the ISO does not need proposal 4.2 to access shorter-term capacity for exceptional dispatches.

#### Significant Event CPMs and supplemental revenues

The ISO appreciates the question about whether supplemental revenues might be applied to significant events and used as an alternative to proposal 4.2. More specifically, the idea would be for the ISO to use supplemental revenues as a resource compensation mechanism for shorter-term significant events, instead of relying on proposal 4.2. However, supplemental revenues are intended to compensate resources who *must* respond to exceptional dispatches but who subsequently decline exceptional dispatch CPM designations. By contrast, the ISO has no authority to make a mandatory significant event dispatch. Therefore, while the ISO appreciates the idea, it believes that proposal 4.2 is a clearer path forward.

#### CPM credits

The ISO appreciates the question about whether proposal 4.1 might interfere with CPM credits. More specifically, the concern is that proposal 4.1 might drive a need for CPM credits to be clawed back from LSEs. However, per ISO tariff section 43A.9, CPM credits do not apply to significant event CPM designations.

#### Evaluating CSP offers based on term

The ISO appreciates the idea to take term into account when evaluating competitive solicitation process offers. Theoretically, this idea could lead to greater efficiency in backstop procurement and associated ratepayer savings. However, the ISO does not have full visibility into term constraints during the initial evaluation stage of the competitive solicitation process. It is only after the competitive solicitation process that such constraints may be revealed to the ISO. Therefore, the ISO must continue with its current process of evaluating CSP offers without initially taking term into account.

#### CPM and Resource Adequacy Availability Incentive Mechanism (RAAIM)

The ISO understands the concern that a resource on outage for the entire term of its CPM designation would still net 5.5% of its CPM revenues. This is because the non-availability charge for a resource providing CPM capacity is based on the difference between the lower bound of the monthly availability standard (94.5%) and the resource's monthly availability percentage, whereas the CPM revenue is based

on 100% of the designated capacity.<sup>16</sup> In other words, with respect to ISO capacity payments, a resource providing CPM capacity will always net at least 5.5% of its CPM revenues. This outcome is a byproduct of RAAIM design and the choice not to impose RAAIM charges until a resource falls below the 94.5 percent availability threshold. As long as the ISO allows a resource to perform at some level below 100 percent and still avoid RAAIM non-availability charges, this will still be an issue. Although this question of RAAIM design falls outside the scope of the CPM Enhancements Track 1 initiative, the ISO may examine RAAIM more broadly in the future.

#### CPM and Use-Limited Resources

The ISO appreciates the recommendation to take into account resource limitations (and more specifically, use-limitations such as starts per month) when making CPM designations. The ISO tariff does already allow the ISO to take such use-limitations into account when evaluating CSP offers.<sup>17</sup>

#### ISO visibility into resource commitments

The ISO appreciates the suggestion to make non-visible resource commitments visible to the ISO and may address this in a subsequent stakeholder initiative.

#### T-30 commercial operation deadline

The ISO understands the question about new generation resources that achieve commercial operation after the ISO's T-30 deadline and whether the ISO might allow such resources to become RA. However, the ISO cannot change the T-30 deadline, as there are numerous downstream ISO processes that rely on this timeline. In addition, for purposes of establishing wheeling priorities, non-ISO balancing authority areas that have capacity sourced within the ISO must identify the sources of that capacity by the T-30 deadline. Accordingly, the ISO cannot change the T-30 deadline without also addressing multiple related topics, none of which are in scope for this particular stakeholder initiative.

#### CPM and CPUC RA Reform

The ISO understands the recommendation to incorporate CPUC RA reform topics into track 1 of this stakeholder initiative. However, the ISO wants to keep track 1 focused on straight-forward operational changes to CPM that can be implemented relatively soon, and so the ISO will address interdependencies with CPUC RA reform topics in a subsequent track and/or stakeholder initiative.

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<sup>16</sup> ISO tariff section 40.9.6.1(a)(2)

<http://www.caiso.com/Documents/Section40-ResourceAdequacyDemonstration-for-SchedulingCoordinatorsintheCaliforniaISOBalancingAuthorityArea-Jun1-2022.pdf>

<sup>17</sup> ISO tariff section 43A.4.2.2

<http://www.caiso.com/Documents/Section43A-CapacityProcurementMechanism-asof-Apr22-2022.pdf>

## 6. EIM Governing Body Role

CAISO staff believes that the WEIM Governing Body would not have a role in the decision about this initiative. The role of the WEIM Governing Body with respect to policy initiatives changed on September 23, 2021, when the Board of Governors adopted revisions to the corporate bylaws and the Charter for EIM Governance to implement the Governance Review Committee’s Part Two Proposal. Under the new rules, the Board and the WEIM Governing Body have joint authority over any proposal to change or establish any CAISO tariff rule(s) applicable to the EIM Entity balancing authority areas, EIM Entities, or other market participants within the EIM Entity balancing authority areas, in their capacity as participants in EIM. This scope excludes from joint authority, without limitation, any proposals to change or establish tariff rule(s) applicable only to the CAISO balancing authority area or to the CAISO-controlled grid.

Charter for EIM Governance § 2.2.1. None of the tariff rule changes currently contemplated in this initiative would be “applicable to EIM Entity balancing authority areas, EIM Entities, or other market participants within EIM Entity balancing authority areas, in their capacity as participants in EIM.” Rather, the proposed tariff rules would be applicable “only to the CAISO balancing authority area or to the CAISO-controlled grid.” Accordingly, the matters scheduled for decision fall outside the scope of joint authority.

While the “EIM Governing Body may provide advisory input over proposals to change or establish tariff rules that would apply to the real-time market but are not within the scope of joint authority,” no aspects of this initiative would apply to the real time market. Accordingly, this initiative falls outside of the WEIM Governing Body’s advisory role as well.

Stakeholders are encouraged to submit a response in their written comments to the proposed classification of as described above, particularly if they have concerns or questions.

## 7. Next Steps

The ISO will host a stakeholder call on December 6, 2022 from 9am to 12pm (PST) to discuss this capacity procurement mechanism enhancements track 1 revised draft final proposal. Written stakeholder comments are due to the ISO by December 20, 2022.