

SEIA ESE Straw Proposal

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Powering the Solar+ Decade



Summary

- SEIA supports an energy storage resource model that is based on resource SOC
- SEIA has concerns that the certain aspects of the proposed reliability and co-located resource enhancements could affect the commercial viability of energy storage projects and hinder development
- SEIA asks that CAISO provide more technical details/examples for the ESR model
 - How will the ESR model interact with dynamic ramp rates, ancillary service awards, etc.

Reliability Enhancements

- Reliability issue not sufficiently defined in the straw proposal
- CAISO's proposal to require energy bids that support DA ancillary service awards could produce uneconomic outcomes and affect commercial viability for storage resources
- Limiting ESRs ability to provide ancillary services is discriminatory and likely inconsistent with FERC Order 841
- Reliability enhancements might be better served in a separate stakeholder initiative

Co-Located Enhancements

- SEIA supports the proposed mechanisms to prevent grid-charging
- SEIA is concerned that the proposed eligibility and timing requirements could limit access to the proposed mechanisms and hinder ESR development
- SEIA proposes that the applicability of the proposed mechanisms be tied to ITC eligibility rules and timelines for simplicity and transparency

Questions?

