

## Stakeholder Comments

Submitted by	Company or Entity	Date Submitted
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### Comments and Questions- Hybrid Resources Initiative

The City of Santa Clara, California, dba Silicon Valley Power (“SVP”) thanks the California Independent System Operator Corporation (“CAISO”) for the opportunity to submit comments and questions regarding the revised draft tariff language posted on July 10, 2020 as part of CAISO’s Hybrid Resources Initiative.

**Following up on SVP’s comments submitted June 3, 2020 (regarding the CAISO’s original draft tariff language) that were not addressed in the CAISO’s June 17 stakeholder matrix, SVP requests the CAISO provide responses to the following questions, and take into consideration the following comments when revising its draft tariff language prior to filing with the Federal Energy Regulatory Commission (“FERC”).**

1) Can the CAISO clarify how referenced Appendix Q (Eligible Intermittent Resources Protocol) would apply to Hybrid Resources as referenced in proposed tariff § 4.8.2?<sup>1</sup> Namely, will CAISO update Appendix Q to the tariff to specifically apply to Hybrid Resource requirements? Given the CAISO’s definition of “Hybrid Resources” proposed in the April 29 straw proposal stating such resources are ineligible to be VERs<sup>2</sup> (though the proposed tariff definition does not include such restriction), it remains unclear how Appendix Q will apply to Hybrid Resources.

2) Where CAISO references “Business Practice Manuals” in proposed tariff § 27.13, can CAISO clarify the scope of issues that will be addressed in the BPMs? Does CAISO intend to publish new information in a BPM regarding how the Aggregate Capability Constraint is applied? Alternatively, is the reference to the BPM in proposed tariff § 27.13 intended to pertain to the existing BPM provisions regarding the Day-Ahead Market and Real-Time Market Awards and Real-Time Dispatch?

<sup>1</sup> Revised Draft Tariff Language at § 4.8.2 (“Scheduling Coordinators for Hybrid Resources with variable or intermittent component Generating Units must provide the CAISO meteorological and outage data for those Generating Units, including the Generating Unit’s High Sustainable Limit, **and as specified in Appendix Q.**” (emphasis added))

<sup>2</sup> April 29, 2020 Second Revised Straw Proposal- Hybrid Resources at 6. *See also id.* at 10 (“Hybrid resources will not receive treatment as a variable energy resource, eligible intermittent resource (EIR), or a participating intermittent resource (PIR), although some of the requirements may be similar.”).