

Stakeholder Comments

Submitted by	Company or Entity	Date Submitted
Ken Kohtz (408) 615-6676	City of Santa Clara, California dba Silicon Valley Power (SVP)	June 3, 2020

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 draft tariff language posted on May 26, 2020 as part of CAISO’s Hybrid Resources Initiative.

Following up on matters discussed in the April 29 straw proposal and May 7 Stakeholder Meeting, 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 presenting the proposal to the CAISO Board of Governors in July.

Regarding Revised Tariff section 4.8.2:

1) Please clarify which resources the added language concerning proposed requirements for Scheduling Coordinators’ data submission and forecasting are intended to apply, *i.e.* to generating units participating as a single resource or multiple resources? Though CAISO is not proposing a tariff definition for Hybrid Resources (as defined in the April 29 proposal) at this time, there is confusion as to whether the proposed requirements in tariff § 4.8.2 are intended to apply to “Hybrid Resources” (single resource) or “Co-Located Resources” (different resources).¹ This confusion is heightened by the fact that there is currently no definition of “co-located” Generating Unit in the CAISO tariff, which is the terminology CAISO uses in proposed § 4.8.2 (in addition to the other draft tariff provisions, as discussed below). It was SVP’s impression from the May 7 stakeholder meeting that CAISO’s proposal requiring Non-Generator Resources (“NGRs”) with Variable Energy Resource (“VER”) components to report forecast data (provided by CAISO or the resource owner) and High Sustainable Limits (submitted by the resource owner) to the CAISO, would apply to “hybrid

¹ See April 29, 2020 Second Revised Straw Proposal- Hybrid Resources, at 6 (proposing definitions for Hybrid Resource and Co-Located Resource).

resources” (*i.e.*, single resource) before a tariff definition was proposed later in this initiative.² This further appears to be the case based on the proposed tariff requirements’ application to “Generating Facilities that include a Generating Unit that would be a Variable Energy Resource absent co-located Generating Units”, which appears to align with the CAISO’s definition of “Hybrid Resources” proposed in the April 29 straw proposal stating such resources are ineligible to be VERs.³ However, SVP requests the CAISO either confirm or clarify SVP’s understanding if incorrect, and that the CAISO also clarify the requirements’ applicability *in the tariff language itself*, perhaps by proposing a definition of “Co-Located Resource” as done in the April 29 straw proposal.

2) If the answer to question (1) is that the CAISO intends these proposed tariff requirements to apply to single resources that would fall under the term “Hybrid Resources” when later defined down in the tariff, and thus to resources that will not be treated as a VER, Eligible Intermittent Resource, or Participating Intermittent Resource,⁴ can CAISO clarify how referenced Appendix Q (Eligible Intermittent Resources Protocol) would apply in revised tariff § 4.8.2? SVP reiterates that it is important to make transparent in the tariff the resources to which CAISO’s proposed requirements would apply.

Regarding Proposed Tariff section 27.13:

1) Similar to the comment above, SVP requests that the CAISO clarify the use of “co-located” in proposed tariff § 27.13 regarding the Aggregate Capability Constraint (“ACC”). While the April 29 straw proposal and May 7 meeting indicate that the ACC is intended to apply to “Co-Located Resources” (multiple resources), SVP requests that CAISO define the term “co-located” upfront to eliminate any confusion down the road as CAISO introduces a “Hybrid Resources” definition and associated requirements into its tariff.

Is there a reason why CAISO proposed a definition for “Co-Located Resources” in its April 29 straw proposal, but does not carry this forward to the draft tariff language? If so, please explain.

2) Where CAISO references “Business Practice Manuals” 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 ACC is applied? Alternatively, is the reference to the BPM in proposed tariff § 27.13 intended to

² See May 7, 2020 CAISO Presentation at Slide 30.

³ April 29, 2020 Second Revised Straw Proposal- Hybrid Resources, at 6.

⁴ *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.”).

pertain to the existing BPM provisions regarding the Day-Ahead Market and Real-Time Market Awards and Real-Time Dispatch?