

Policy Initiatives Catalog Submission Form

This purpose of this form is to propose potential policy initiatives that require a stakeholder process and typically require tariff changes. Do not use this form to request or propose process improvements or administrative changes. Such requests should be made through your Customer Service Representative or Account Manager.

California ISO Policy Initiatives Catalog Submission Form

Date: 7/1/2020

Submitter Information

Organization	Contact Name	E-mail	Phone
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Please provide a title for the issue.

Energy Storage Bid Cap is not aligned with FERC Order No. 831

Please provide a summary description of the issue (i.e. 500 words)

Currently, energy storage resources are only able to bid up to the soft bid cap of \$1,000 MWh. FERC Order No. 831 raises the soft bid cap of \$1,000/MWh to a hard bid cap of \$2,000/MWh when costs-based offers can be verified, or the CAISO calculated maximum intertie bid price exceeds \$1,000/MWh. SCE is requesting CAISO to align the energy storage resources bidding parameters with FERC Order No. 831.

Please provide any data/information available that would characterize the importance or magnitude of the issue.

Energy Storages resources should not be treated differently from other resources, putting them at a distinct disadvantage when market prices exceed \$1,000 MWh. Their bidding opportunity should be the same as other resources that are able to properly reflect their costs when market prices rise.