



Stakeholder Comments Template

Hybrid Resources Initiative: Straw Proposal

This template has been created for submission of stakeholder comments on the **Hybrid Resources Initiative, Second Revised Straw Proposal** that was held on May 7, 2020. The meeting material and other information related to this initiative may be found on the initiative webpage at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/HybridResources.aspx>

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on May 28, 2020.

Submitted by	Organization	Date Submitted
<i>Grant McDaniel 530-300-3562</i>	<i>Wellhead</i>	<i>5/26/20</i>

Please provide your organization's comments on the following topics and indicate your organization's position on the topics below (Support, Support with caveats, Oppose, or Oppose with caveats). Please provide examples and support for your positions in your responses as applicable.

1. Terms and Definitions

Wellhead fully supports the proposed terms and definitions.

2. Market Interaction for Hybrid Resources

Wellhead fully supports all proposed market interactions and specifically applauds the proposal not to model the SOC for hybrid resources.

3. Point-of-Interconnection (POI) Constraint for Co-Located Resources

Wellhead supports the proposed POI constraint, as amended.

4. Metering

Wellhead fully supports the proposed process for determining meter requirements

5. Resource Adequacy

Wellhead supports the CAISO's current position on RA but would like to broaden the discussion to include the MCC bucket value that generation can add to storage RA in a co-located configuration when the storage might otherwise be charged constrained. For example, Wellhead believes that energy storage in a gas-storage hybrid (NGR configuration) and energy storage co-located with gas should be able to count as a category 4 resource having 24 X 7 availability.