

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Establish
Policies, Processes, and Rules to Ensure
Safe and Reliable Gas Systems in
California and perform Long-Term Gas
System Planning

Rulemaking 20-01-007
(Filed January 16, 2020)

**COMMENTS ON TRACK 2a DRAFT WORKSHOP REPORT OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

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Dated: March 15, 2022

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I. Introduction

The California Independent System Operator Corporation (CAISO) submits comments on the Track 2a Draft Workshop Report per the *Administrative Law Judges' Ruling Issuing Draft Workshop Report and Seeking Comments*.

The CAISO appreciates having had the opportunity to present at the Commission's Track 2 workshop on Gas Infrastructure and provide its perspectives on planning necessary to ensure electric reliability before a significant natural gas asset is derated or decommissioned. The CAISO provides limited clarifications to Sections 5.5.1 and 5.5.3 of the Draft Workshop Report.

II. Proposed Edits

The CAISO provides proposed edits in redline below.

Section 5.5.1 (pp. 48-49):

“CAISO’s detailed local capacity studies can also provide estimates of the capability of battery storage to replace existing generation and an analysis of charging limitations on battery storage.

Ms. Hou provided insight into CAISO’s study studies on transmission options to reduce local capacity requirements, which helps identify constraints on the system and discuss how to reduce them to better utilize existing resources. For CAISO’s analyses to be more accurate and lead to actionable plans, CAISO ~~would~~ needs detailed generation information to model, ~~which~~ including es the replacement energy resources. She noted that the modeling process would be

iterative, and generation options can be considered alongside, or instead of, transmission options. Generation and transmission solutions are long lead time assets. With uncertainties such as multiple cloudy days that reduce renewable generation and/or battery storage, and given the speed and location of electrification, CAISO strongly recommends that detailed modeling ~~is~~ first be based on scenarios that the Commission supports or the state supports (e.g., for example through its SB 100 process).”

Section 5.5.3, page 49:

“Ms. Hou responded that ~~because since~~ battery storage is relatively new, CAISO is still trying to understand its operational characteristics, such as lifespan and replacement provisions. The CAISO includes these ~~These~~ characteristics ~~in its are put into CAISO’s~~ models, which use resources the Commission transmits to the CAISO. These resources are selected from an optimized portfolio produced by the Commission in conjunction with the CEC’s demand forecast to get a fuller picture.”

III. Conclusion

The CAISO appreciates the opportunity to provide clarifications to the Track 2a Draft Workshop Report.

Respectfully submitted

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