

## Stakeholder Comments Template

### Subject: Regional Resource Adequacy Initiative – Working Group, July 21, 2016

Submitted by	Company	Date Submitted
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This template has been created for submission of stakeholder comments on Working Group for the Regional Resource Adequacy initiative that was held on July 21, 2016 and covered the topics of Maximum Import Capability, Imports for RA issues, and Uniform Counting Rules. Upon completion of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com). Submissions are requested by close of business on **July 29, 2016**.

Please provide feedback on the July 21 Regional RA Working Group:

#### 1. Maximum Import Capability (MIC) calculation methodology proposal

- a. Do you support the ISO's proposal to modify the methodology for calculating the MIC values in an expanded BAA for use in limited circumstances to reflect situations where a PTO that joins the ISO has a need to serve its peak load that occurs non-simultaneously with the rest of the system and when there are no simultaneous constraints between certain areas of an expanded ISO BAA? If not, why not?
- b. Do you support a transition period or transitional mechanism for this MIC calculation proposal?
- c. Please provide any further details or positions on the ISO's proposal to modify the methodology for calculating the MIC values in an expanded BAA.

#### 2. MIC allocation methodology proposal

- a. Do you support the ISO's proposal to modify the methodology for allocating the MIC to LSEs in an expanded BAA, in order to limit initial allocations of MIC capability to particular sub-regions of ISO that would be defined by the Regional TAC Options sub-regions? If not, why not?

- b. Do you agree that splitting of the initial MIC allocations among sub-regions, combined with the ability to bilaterally transfer MIC between the Regional TAC Options sub-regions and the final Step 13 ability to nominate any remaining MIC anywhere in the footprint will properly balance MIC allocation method needs for an expanded BAA? If not, why not?
  - c. Do you support a transition period or transitional mechanism for this MIC allocation proposal?
  - d. Please provide any further details or positions on the ISO's proposal to modify the methodology for allocating MIC in an expanded BAA.
3. Substitution of internal Resource Adequacy resources with external resources
- a. Do you support the ISO's proposal to allow external resources to substitute for internal RA resources experiencing outage requiring substitution?
  - b. Do you believe that one of the conditions of allowing external resource to substitute for internal RA resources should be that the external resource has similar operating characteristics of the outage resource? If so, how would the ISO determine the external resource substitute has similar characteristics?
  - c. Please provide any further details or positions on substitution of internal Resource Adequacy (RA) resources with external resources.
4. Import resources that qualify for Resource Adequacy
- a. Do you agree that the rules for import resources qualifying for RA should be clarified in order to remove ambiguity from the Tariff?
  - b. Do you believe that there should be a role for bilateral spot market energy purchases or short-term firm market energy purchases procured outside of the ISO BAA to qualify for RA meet a portion of an LSE's requirements? If so, why? If not, why not?
    - i. If you believe that some types of energy-only transactions should qualify for RA purposes, should there be a limit or cap on the volume that individual LSEs could utilize those resources for RA purposes?
    - ii. How could the ISO actually analyze the reliability that would be provided with various levels of these energy transactions being used to meet RA requirements?
  - c. Please provide any further details or positions on import resources qualifying for RA purposes.
5. Uniform counting rules proposal
- a. Do you agree with the ISOs proposal to use the Pmax methodology for most thermal resources and participating hydro? If not please specify, why not? Are there elements of this methodology that require additional detail prior to a policy filing?

With the move to ELCC counting for wind and solar, the ISO should strongly consider whether ELCC should be applied to all resource types.

- b. Do you agree with the ISOs proposal to use ELCC to establish the capacity values for wind and solar resources? If not, please specify why not. Are there elements that require additional detail prior to a policy filing?

As articulated in previous comments, AWEA and Interwest strongly support the use of the ELCC method and appreciates that the ISO has committed to moving forward with this method. While AWEA and Interwest feel that the ISO needs to continue to develop the ELCC methodology to ensure that it is ready to be implemented when the regional ISO becomes effective, AWEA and Interwest do not believe that additional details are *critical* to a policy filing.

- c. Are there any element of an ELCC methodology that must be established prior to the ISOs policy filing?

As mentioned above, AWEA and Interwest encourage the ISO to continue moving forward with developing he details of ELCC, but AWEA and Interwest do not believe that additional details are *critical* to the policy filing the ISO will make with the ISO Board later this year. As the regional ISO process is currently envisioned, there will be ample opportunities to develop the details of ELCC and present them to the ISO Board at a later date

- d. Do you agree with the ISOs proposal to use the historical methodology for run-of-the-river hydro, and Qualifying Facilities including Combined Heat and Power? If not please specify, why not? Are there elements of this methodology that require additional detail prior to a policy filing?
- e. Do you agree with the ISOs proposal to use the registered capacity value methodology for load based capacity products such as PDR, RDRR, and Participating Load? If not please specify, why not? Are there elements of this methodology that require additional detail prior to a policy filing?
- f. Do you agree with the ISOs proposal to use the registered capacity value methodology for Non-Generator Resources (NGR) and pumped hydro? If not please specify, why not? Are there elements of this methodology that require additional detail prior to a policy filing?
- g. Are there any additional uniform counting rules that should be developed prior to the ISOs policy filing?