

# Stakeholder Comments Template

## Regional Resource Adequacy Initiative Issue Paper

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This template has been created for submission of stakeholder comments on the issue paper for the Regional Resource Adequacy Initiative that was posted on December 9, 2015. The issue paper and other information related to this initiative may be found at:

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

Upon completion of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com). Submissions are requested by close of business on **January 7, 2016**.

If you are interested in providing written comments on the issue paper, please provide your comments below.

CDWR supports accommodating different local regulatory authority (“LRA”) resource procurement programs while changing the needed tariff provisions for regional RA. ISO states that major changes to current RA program will not occur and believes that most tariff provisions will work; so, any changes that are necessary should not alter the LRA’s RA provisions. The changes should be made to facilitate other LRAs to join CAISO rather than to alter existing LRA RA programs.

### **Demand forecast**

LRA’s demand forecast methodology should not be impacted. Currently, CDWR forecasts its most likely coincident peak load and provides to CEC. CDWR’s power forecasts are driven by water supply and demand (and other factors such as environmental constraints) and most likely demand in real time would be the forecast as close to the month as possible. Any method prescribed for standardized demand forecast that does not support the nature of CDWR’s pumping operations will result in higher inaccuracies and inefficiencies. Forecasting methodology adopted by CDWR based on its actual operations is a part of LRA RA program and should not be impacted by any standardized methods of forecasting used for retail loads.

### Counting capacity for RA

ISO contemplates adding new default tariff provisions to determine capacity of resources that can count toward meeting RA obligation. ISO provides example on wind and solar resources where there is a need for reevaluation and indicates that calculations method does not exist for storage resources. If there is further need of such provisions beyond the existing provisions, they should only be added as the default provisions. LRA's own criteria should not be impacted.

### Standardization

The issue paper considers standardization on planning reserve margin and counting criteria. Most LRAs adopt 15% planning reserve margin (PRM) which is the default standard in the tariff. Some LRAs may have credits on demand response resource providing RA capacity. If there is a need for higher PRM and is to be adopted by all, then such needs should be demonstrated. As such, the guiding principle, as stated, should not alter the LRA RA programs that are working fine. LRA RA programs set PRM and counting criteria. Any changes to these provisions should be avoided. Standardization should be limited to default provisions and would be applicable to the entities that choose to adopt ISO default provisions.