

Informal Comments of the CAISO Department of Market Monitoring on the second four Track 3B.2 Slice-of-Day Workshops

R.19-11-009

December 23, 2021

The Department of Market Monitoring (DMM) of the California Independent System Operator Corporation (CAISO) appreciates the opportunity to provide informal comments on topics presented in the second set of Track 3B.2 resource adequacy workshops. In D.21-07-014¹, the Commission directed parties to develop a final restructuring proposal that lays out the implementation details based on PG&E's slice-of-day framework. As stated in our last set of informal comments, DMM continues to support SCE's 24-Hourly Slice framework as the final restructuring proposal to be submitted to the Commission.

The 24-Hourly Slice framework seems to best meet the criteria set out by the Commission in D.21-07-014 to establish a durable resource adequacy framework that addresses hourly energy sufficiency while supporting the state's renewable energy goals. As California continues to see increased penetration of use-limited and preferred resources, a 24-Hourly Slice framework is better structured to meet the energy requirements across all hours of the day compared to other frameworks that are designed around meeting a peak gross and/or peak net load.

Consequently, DMM supports further development of the 24-Hourly Slice framework as the working group prepares to file a comprehensive workshop report to the Commission. DMM looks forward to future engagement and continued discussion in the resource adequacy proceeding.

¹ *Decision on Track 3B.2 Issues: Restructure of the Resource Adequacy Program*, July 15, 2021: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M393/K334/393334426.PDF>

Respectfully submitted,

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