

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

Order Instituting Rulemaking to Oversee the
Resource Adequacy Program, Consider
Program Reforms and Refinements, and
Establish Forward Resource Adequacy
Procurement Obligations

Rulemaking 21-10-002
(Filed October 7, 2021)

**COMMENTS ON ADMINISTRATIVE LAW JUDGE’S RULING ON
REGIONAL WIND EFFECTIVE LOAD CARRYING CAPABILITY STUDY OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

I. Introduction

The California Independent System Operator Corporation (CAISO) submits opening comments on Energy Division’s Regional Wind Effective Load Carrying Capability study results (Energy Division Study) per the June 1, 2022 Ruling on Energy Division’s Regional Wind Effective Load Carrying Capability Study (Ruling) by Administrative Law Judge Chiv.

In the resource adequacy Implementation Track Phase 2 and Reform Track Proposed Decision, the Commission seeks to adopt regional wind effective load carrying capability (ELCC) values for resource adequacy year 2023 subject to the results of an Energy Division study and party comments.¹ The Energy Division Study provides wind ELCC values for six regions spanning California and other western states. Commission adoption of regional wind ELCC values for resource adequacy year 2023 will require the CAISO to change its internal processes to account for regional ELCC values. Those process changes will require coordination with Energy Division.

¹ Cal. Pub. Util. Comm’n., *Proposed Decision of Administrative Law Judges Chiv and O’Rourke adopting local capacity obligations for 2023-2025, flexible capacity obligations for 2023, and Reform Track framework*, May 20, 2022, p. 24.

II. The Commission Should Direct Energy Division Staff to Coordinate with the CAISO

The Energy Division Study proposes different monthly ELCC values for wind resources based on location. If the Commission adopts this proposal, the CAISO must change, in at least two ways, how it administers its Customer Interface for Resource Adequacy (CIRA) system to implement regional wind ELCC values for California-based resources that will require coordination with Energy Division.²

For existing California-based resources in the CAISO market, Energy Division staff maps the wind ELCC values to each resource ID under the resource adequacy program. Under today's process, the monthly ELCC value for wind is the same for all wind resource IDs. If the Commission adopts the Energy Division Study, northern and southern California-based wind resources will have different ELCC values. To avoid confusion about the region to which a resource should be mapped, the CAISO asks that when Energy Division staff transmits resource qualifying capacity values to the CAISO in the year-ahead process it also identifies each resource's regional wind area. This approach will ensure consistency with today's process while accommodating regional wind values.

The CAISO's CIRA system cannot assign different ELCC values for new wind resources requesting net qualifying capacity (NQC) outside of the annual NQC process. Under the existing system design, all wind resources receiving an NQC value mid-year would have the same ELCC value regardless of their region. The CAISO must update CIRA to recognize more than one possible ELCC value for the same fuel type to validate ELCC values of new resources in the monthly resource adequacy process. Because the CAISO cannot make system changes in time for resource adequacy year 2023, the CAISO will work with the Energy Division staff to implement a manual process for 2023 to assign a new wind resource requesting NQC in the monthly resource adequacy process a regional ELCC value based on its geographic location.

III. Conclusion

The CAISO appreciates the opportunity to provide comments on the Energy Division

² The CAISO's implementation issues noted here do not apply to non-California resources.

Study and looks forward to continued coordination with the Commission and Energy Division staff on this issue.

Respectfully submitted

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