

Middle River Power Comments on Effective Flexible Capacity Ratings Process Clarification

Middle River Power (“MRP”) thanks the California ISO (“CAISO”) for the opportunity to submit comments on the EFC Ratings Process presentation and call held on May 14, 2019. We provide the following brief comments on the updates and process.

Process

MRP has serious concerns with the CAISO proposing changes to resources’ flexible counting rules and eligibility within a tariff “process clarification.” Many of the proposed tariff changes are not merely clarifications and instead are significant changes to established RA policy for different resource types.

It is MRP’s understanding that the tariff waiver and cleanup language surrounding how flexible RA is calculated for thermal resources will not change current flexible RA policy (or calculations) and therefore can be considered “clarifications.” The remaining scope of the initiative, however, clearly includes policy changes; therefore it must, at a minimum, be presented and market noticed to stakeholders this way. MRP believes the CAISO’s typical standard would have these changes go through a stakeholder initiative process and therefore asks for the non-clarification items to move to a new initiative or be included in the CAISO’s ongoing RA Enhancements initiative.

Proposal

MRP asks for additional clarification regarding the following topics. It would be helpful if the CAISO could provide:

1. A numerical example of how both the Battery Storage and CHP EFC calculations are changing with a clear “before” and “after” EFC rating.
2. A bar chart, similar to what was in the presentation for other resources, for how the hydro EFC proposal will change hydro flexible availability in aggregate.

Attestation

MRP also asks that the CAISO immediately clarify in a market notice which resources must file the flexible attestation. It is unclear to MRP whether this is for new or existing RA resources.

Finally, MRP thanks the CAISO for the opportunity to comment and working with market participants to ensure a transparent, open stakeholder process.