

Stakeholder Comments Template

Submitted by	Company	Date Submitted
Anand Durvasula & Charles Mee Anand.Durvasula@cpuc.ca.gov ; Charles.Mee@cpuc.ca.gov (415)-703-2765; (415)-703-1147	The Office of Ratepayer Advocates (ORA)	11/02/15

The Office of Ratepayer Advocates (ORA) is the independent consumer advocate within the California Public Utilities Commission (CPUC). ORA's statutory mandate is to obtain the lowest possible rates for utility services consistent with reliable and safe service levels. ORA also advocates for customer and environmental protections in connection with utility service. ORA appreciates the opportunity to comment on the October 26, 2015 Frequency Response Initiative straw proposal.

Please use this template to provide your comments on the presentation and discussion from the stakeholder web conference held on October 19, 2015.

Submit comments to InitiativeComments@caiso.com

Comments are due November 2, 2015 by 5:00pm

The presentation discussed during the October 19, 2015 stakeholder web conference may be found on the [Frequency Response Initiative](#) webpage.

Please provide your comments on the ISO's straw proposal for each of the eight issues listed below along with the ISO's straw proposal. The ISO welcomes comments in addition to these issues as well.

Frequency Response Standard

The ISO believes the straw proposal and its accompanying technical appendix covers the standard's requirements for compliance purposes. The ISO is endeavoring to provide sufficient information to stakeholders for effective evaluation of the ISO's proposal. The ISO seeks comments on whether any unresolved questions on the standard and the ISO's obligation still exist.

Comments:

Frequency Response Drivers

Several factors contribute to the primary frequency response performance of participating generators having governors. The ISO discusses some of the main drivers of PFR performance in Section 4.2 of its straw proposal. These factors include (1) magnitude of frequency deviation, (2) amount of synchronous on-line capacity providing sustained PFR, and (3) headroom available from that connected on-line capacity.

The ISO is evaluating what additional data points would need to be included in its Masterfile or through other mechanisms to facilitate a market tool or product to be designed. The ISO seeks comments on what factors influence a generators ability to provide PFR in the event of a frequency disturbance and the pieces of information necessary to estimate expected PFR.

Comments:

Phase 1, addressing real-time deficiencies

Section 6.2 of the straw proposal discusses Phase 1 of the initiative which will enact the five steps to ensure it is capable of meeting the requirement at that time. The first step discussed in section 6.2.1 is to develop "look-ahead" tools to assess the PFR capability of the system at various time horizons in the future based on current system conditions. If the look ahead indicates an anticipated deficiency of PFR the ISO can take actions to address the deficiency.

The ISO seeks comments on its proposal for addressing real-time PFR deficiencies for 2017 compliance period.

Comments:

Phase 1, tariff and interconnection revisions

Section 6.2 of the straw proposal discusses Phase 1 of the initiative which will enact five steps to ensure it is capable of meeting the requirement at that time. The first step discussed in section 6.2.2 is to revise the tariff to include requirements for all participating synchronous generators with governors, not just those providing spinning reserves, to set governors to specified droop settings and deadbands, and to not override governor response through outer-loop controls or other mechanisms.

The ISO seeks comments on the tariff revisions it is proposing to help the ISO ensure sufficient frequency responsive headroom and whether other revisions should be considered.

Comments:

Phase 1, ISO's practice of preserving operating reserve headroom

Section 6.2 of the straw proposal discusses Phase 1 of the initiative which will enact five steps to ensure it is capable of meeting the requirement at that time. The first step discussed in section 6.2.3 is to revise the tariff to clarify the authority of the ISO to designate any reserve not previously identified as Contingency Only by a Scheduling Coordinator (SC) as Contingency Only reserves.

Comments:

Phase 1, performance requirements

Section 6.2 of the straw proposal discusses Phase 1 of the initiative which will enact five steps to ensure it is capable of meeting the requirement at that time. The first step discussed in section 6.2.4 is to include frequency response performance requirements for resources with governor control and frequency responsive capacity available.

The ISO will continue to develop the details of a proposed performance requirement and seeks comments from stakeholders on an appropriate performance requirement.

Comments:

Phase 1, allocation of BAL-003-1 non-compliance penalties

Section 6.2 of the straw proposal discusses Phase 1 of the initiative which will enact five steps to ensure it is capable of meeting the requirement at that time. The first step discussed in section 6.2.5 is considering provisions for allocating any non-compliance penalties associated with BAL-003-1, should they be imposed on the ISO, to resources that should have provided more PFR than they actually delivered during frequency events.

The process discussed in ISO tariff section 14.7 applies to an allocation of any reliability-based penalty. The ISO seeks comment on how it could apply these tariff provisions to BAL-003-1 compliance and whether it should explore additional tariff provisions beyond those set forth in section 14.7 to impose responsibility for penalties on any resource that fails to provide primary frequency response for which it has an obligation to provide.

Comments:

Phase 2, long-term approaches

Phase 2 of the initiative will evaluate if a market constraint or product is better suited to competition for frequency response capability (Section 6.3 of straw proposal). Such market-based mechanisms could not be designed, approved and implemented by December 1, 2016, and therefore the ISO will need to consider them in a second phase of this initiative.

Comments:

Since the Frequency Response service is provided automatically and there is no need for operator intervention, the most economical way of getting this service is for generators to continue to provide it of free. Therefore, ORA recommends that CAISO modify its tariff—especially the generator interconnection agreement and/or participating generator agreement to require generators to automatically provide the service for free via the use of governors. For renewable generators, the CAISO should require them to install smart invertors so they can also provide the frequency response service automatically for free. This approach will be more economic because the CAISO does not need to design a new ancillary service product and incur corresponding administrative costs.