2018 Local Capacity Technical Study Criteria, Methodology, and Assumptions

Submitted by	Company	Date Submitted
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PG&E provides the following comments on the CAISO's 2018 Local Capacity Technical Study Criteria, Methodology, and Assumptions, presented and discussed on the stakeholder call held October 31, 2016.

1. <u>PG&E asks that the CAISO provide the month when each local area peak occurs.</u>

Table 5 in the 2017 Local Capacity Technical Analysis presents the 1-in-10 Peak Load forecast for each local capacity area. A footnote below Table 6 indicates that the sum of the local area peaks is not the system coincidental peak, as local areas can peak at a time different from the system coincident peak load. The CAISO should provide the peak month for each local area, either in a table similar to Table 5, or in the section of each local area when the "total busload within the defined area" is documented. The CAISO should also recognize that Regional Expansion will create more non-coincident local areas.[1] As a result, this will lead to the need for more documentation on how non-coincidental local peaks are addressed, including which peak load is used and which monthly NQC values are used.

2. <u>PG&E asks the CAISO to correct any potential inconsistencies between the time period when local peak load is expected and the level of dependable capacity that is expected from resources.</u>

There is a potential inconsistency between when the non-coincidental local peak load occurs, how local capacity resources are studied, and how the same resources are assessed in monthly RA showings. The 2017 Local Capacity Technical Analysis shows that resources are studied by

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[1] As has been discussed extensively in the on-going Regional Resource Adequacy initiative, PacifiCorp's Pac West service area is winter peaking and will be seasonally non-simultaneous – as an entire TAC sub-region -- with the current CAISO footprint.

using the August NQC value. In monthly RA showings, the CAISO assesses resources based on their monthly NQC value in each month. Since the Local Capacity Requirements are based on non-coincidental peaks, it is possible that the August NQC values are not appropriate. In lieu of creating 12 different local requirements by month, PG&E recommends that the CAISO assess Local Capacity Areas based on the non-coincidental local peak and use the NQC associated with the month in which the non-coincidental peak occurs in the Local Capacity Technical Study. PG&E is not proposing to change the RA showing validation process at this time.

3. <u>PG&E asks that the CAISO provide all sub-area boundaries in the 2018 Local Capacity Technical Analysis</u>

In the 2017 Local Capacity Technical Analysis, the transmission and substations that create the boundaries of each sub-area are only presented in Stockton and Kern local capacity areas. Even in these local areas, the boundaries are not provided for all sub-areas. For consistency, PG&E recommends the CAISO publish all boundaries for each sub-area. This will allow stakeholders to understand when/if the boundaries of sub-areas change between annual local studies.

4. <u>PG&E would appreciate more information on what the CAISO classifies as "Self-generation loads".</u>

According to the 2017 Local Capacity Technical Analysis, these loads are assumed to not vary with temperature. PG&E would like to understand whether load served by behind the meter PV is considered a self-generation load.

5. <u>PG&E would appreciate if the CAISO could clarify in the 2018 Technical Analysis the difference between the Kern PP Sub-area and South Kern PP sub-area.</u>

The area definition in the 2017 Local Capacity Technical Analysis refers to a Kern PP sub-area, but this sub-area does not appear in the Local Analysis.