



Stakeholder Comments Template

CAISO RA Workshop: Current Processes and Interoperability with the CPUC's Slice of Day Reform

This template has been created for submission of stakeholder comments on the CAISO RA Workshop: Current Processes and Interoperability with the CPUC's Slice of Day Reform stakeholder call that was held on June 06, 2023. The meeting presentation and meeting recording for this initiative have been posted to the Miscellaneous stakeholder meetings [webpage](#).

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **June 20, 2023**.

Submitted by	Organization	Date Submitted
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Please provide your organization's comments on the following issues and questions.

1. What feedback does your organization have on the CAISO's approach to treat the CPUC's Slice of Day reform 2024 (test year) as informational only?

The CAISO proposes using 2024 as a non-binding test year for compliance, with no impacts on the CAISO's status quo resource adequacy (RA) showing processes.¹ When the California Public Utilities Commission's (CPUC's) RA program switches to a binding Slice of Day methodology in 2025, the CAISO notes that, "[a]ny reforms for assessments or deficiencies for RA [compliance year] 2025 would be a result of broader reform taking place in the CAISO's RA Enhancements initiative."² The CAISO's proposal to use 2024 as a test year is reasonable. However, rather than moving its own reforms for 2025 to an open-ended timeline, the CAISO should endeavor to develop data and/or solutions for

¹ CAISO RA Workshop: Current Processes and Interoperability with the CPUC's Slice of Day Reform, June 6, 2023 (RA Reform Workshop Presentation), at 56, available at <http://www.caiso.com/Documents/Presentation-CAISO-RA-Workshop-Current-Processes-and-Interoperability-Jun6-2023.pdf>.

² RA Reform Workshop Presentation at 56.

anticipated Slice of Day adaptations as ready as possible so that the results are informative and ready for adoption when Slice of Day reform is fully implemented. If the CAISO does not have ex ante benchmarks or processes in place to measure performance against, it is unclear what is being “tested” in the 2024 test year.

2. What feedback does your organization have on the CAISO’s approach to address compliance for the CPUC’s Slice of Day reform in 2025 (implementation year) as a part of the broader Resource Adequacy (RA) Enhancements initiative?

Cal Advocates has no comment at this time.

3. Are there any key risks your organization has identified if the CAISO does not make any changes to the CAISO’s RA program and processes for resource adequacy year 2024 or 2025, with respect to the CPUC’s Slice of Day reform?

Mismatches between CPUC and CAISO assumptions about resource availability could lead to a higher risk of backstop procurement by CAISO if the CAISO’s RA processes are not adapted to the CPUC’s Slice of Day reform for RA year 2025. The CAISO should establish go-live deadlines for its own reforms so that the RA market has more certainty surrounding long-term Net Qualifying Capacity (NQC) values. This will promote stability and predictability in RA and mitigate backstops since compliance showings at the CPUC and CAISO would be consistent. Resource adequacy across the West is in a state of major flux, and the CAISO should endeavor to provide as much certainty surrounding NQC as possible in order to facilitate load-serving entity (LSE) procurement planning and successful RA compliance.

4. Is there a data analysis approach your organization has developed or analysis your organization recommends the CAISO should develop to analyze the CPUC’s Slice of Day reform effort?

Cal Advocates has no comment at this time.

5. What topics does your organization recommend the CAISO address in upcoming RA Enhancements working group meetings? Do you have a recommended prioritization?

At the June 6, 2023 workshop, multiple stakeholders expressed concern over mismatches between NQC values for energy storage resources. Specifically, the CAISO could receive a single NQC value for an energy storage resource from the CPUC reflecting use of the resource at full capacity during peak. However, an LSE could apportion the capacity value for that same resource differently in its showing to the CPUC, depending on the hourly slice of day. Cal Advocates recommends that the CAISO prioritize solving this issue in the present stakeholder initiative.

6. For non-CPUC jurisdictional LRAs, are there any changes occurring to your RA program in the next few years that the CAISO should be aware of?

Cal Advocates has no comment at this time.

7. Please provide any additional comments you may have on the workshop discussion.

Cal Advocates has no comment at this time.