

 <b>California ISO</b>	<b>Market and Infrastructure Policy</b>	<b>Template Version:</b>	<b>1</b>
		<b>Document Version:</b>	<b>0</b>
<b>Policy Initiatives Catalog Submission Form</b>		<b>Date Created:</b>	<b>6/1/2017</b>

## California ISO Policy Initiatives Catalog Submission Form

This purpose of this form is to propose potential policy initiatives that require a stakeholder process and typically require tariff changes. Do not use this form to request or propose process improvements or administrative changes. Such requests should be made through your Customer Service Representative or Account Manager

**Date:** 7/30/2018

### Submitter Information

Organization	Contact Name	E-mail	Phone
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### Please provide a title for the issue.

Multi-Stage Generation Registration under a Metered Subsystem

### Please provide a summary description of the issue (i.e. 500 words)

Silicon Valley Power (SVP) operates under a Metered Subsystem Agreement with the CAISO and has a number of issues it would like the CAISO to address regarding CAISO's Multi-Stage Generator (MSG) registration procedures, as well as its Use Limited Plan Data Template (ULPDT) procedures. SVP owns and operates a combined cycle generation facility that is registered as a single unit in the CAISO system – as when the CAISO created the MSG option, we understood the CAISO was concerned about MSG units existing within a Metered Subsystem (MSS). Initially, this MSG application limitation was a non-issue for SVP, as we historically self-scheduled our combined cycle resource at base load. That said, today SVP operates its combined cycle generating facility very differently as we economically bid the resource into the CAISO markets. What we have realized is that not having this combined cycle generating facility registered as an MSG impacts how the unit gets dispatched - as the operation of the unit (including ramping, MIN and MAX parameters) changes based on the configuration that is being used, and those parameters are not respected due to the unit currently being registered as a single unit. In working around this limitation, we need to update the limits (to the best of our ability) in real time via OMS so that the Ramp, MIN and MAX Gen parameters reflect how the combined cycle generating facility is operating. The inability to accurately capture or bid in the configuration of our combined cycle resource has led to SVP incurring deviation penalties at the generator level and at the portfolio level, where we are assessed load following deviation charges under its MSS Agreement.

The second issue we have is that this combined cycle generating unit also has duct firing capability that we cannot register in the Use Limited Plan Data Template (ULPDT) as we need to specify a configuration for this duct firing – something we cannot do because the unit is

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currently registered as a single unit. There is currently no workaround we are aware of for the ULPDT registration situation.

**Please provide any data/information available that would characterize the importance or magnitude of the issue.**

The Resource ID of the generation unit we want to register as an MSG is DUANE\_1\_PL1X3. During the ULDPT call held by the CAISO on 6/26/18, the team expressed the importance of competing the ULPDT and gave an example of a gas fired MSG resource - with duct firing capability - would have a limitation on that specific configuration. This appears to be similar to the case of our DUANE\_1\_PL1X3 resource. However, as stated earlier, we cannot register this resource because it is modeled as a single unit, due to its existence within a MSS. Allowing us to register our resource as an MSG would not only fix the dispatch issues we have been experiencing, but it will also allow us to more accurately register the limitations and operating characteristics of the resource.

Lastly, the latest conformed tariff (under the area of MSG registration in Section 27.8) does not appear to restrict the potential registration of the unit as an MSG. While the definition of Multi-Stage Generating Resources includes a statement that “Metered Subsystems ... do not qualify as Multi-Stage Generating Resources” SVP is not seeking to register its Metered Subsystem as a MSG – SVP seeks to register one of its resources within its MSS portfolio as a MSG.

[https://www.caiso.com/Documents/RequiredRegistration\\_AllUse-LimitedResources\\_Preparation-CCE3ActivationDeadlineExtendedCall06262018.html](https://www.caiso.com/Documents/RequiredRegistration_AllUse-LimitedResources_Preparation-CCE3ActivationDeadlineExtendedCall06262018.html)