



Stakeholder Comments Template

Hybrid Resources Initiative: Straw Proposal

This template has been created for submission of stakeholder comments on the **Hybrid Resources Initiative, Straw Proposal** that was held on October 3, 2019. The meeting material and other information related to this initiative may be found on the initiative webpage at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/HybridResources.aspx>

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on October 21, 2019.

Submitted by	Organization	Date Submitted
<i>Adam Stern 202-899-0922 Gabe Tabak</i>	<i>American Wind Energy Association</i>	<i>10/21/2019</i>
<i>Danielle Osborn Mills 916-320-7584</i>	<i>AWEA-California</i>	<i>10/21/2019</i>

Please provide your organization's comments on the following topics and indicate your organization's position on the topics below (Support, Support with caveats, Oppose, or Oppose with caveats). Please provide examples and support for your positions in your responses as applicable.

1. Hybrid Resource Definition

Please provide your organization's feedback on the Hybrid Resource Definition as described in the straw proposal.

AWEA appreciates CAISO's effort to better define hybrid resources and believes that the delineation between hybrid resources and co-located resources, as CAISO has described in the Straw Proposal, is helpful. The terms provide additional clarity for stakeholders and the CAISO as discussions on hybrid and co-located resources continue.

2. Hybrid Resources Business Drivers and Use Cases

Please provide your organization's feedback on the Hybrid Resources Business Drivers and Use Cases described in the straw proposal.

3. Forecasting

Please provide your organization's feedback on the forecasting topic as described in the straw proposal.

CAISO's proposal to allow hybrid resources to self-submit forecast schedules should provide hybrid resource owners with the flexibility to optimize their project based on the value driver of the project. AWEA supports CAISO's proposal to allow self-submission of forecasts for hybrid resources.

If "strategic forecasting" is something CAISO plans to monitor for, then CAISO should provide all stakeholders with a definition of "strategic forecasting" and clearly define the types of market behavior that CAISO is seeking to prevent. Market participants will need a clear understanding of what self-provided forecasting and related bidding behaviors are acceptable and what will be considered "strategic" and potentially problematic.

CAISO has proposed that, for all hybrid resources CAISO will not provide forecasting, even for the underlying VER components of the resource. It should be noted that a hybrid resource could well be composed of two individual VER components (e.g. wind and solar). At a minimum, when the underlying components of the hybrid resource are VERs, CAISO should continue to provide forecasting for the resource. Additionally, many resource owners may wish to pay a forecasting fee to CAISO in order to obtain a forecast for the portion of a hybrid resource which is VER. CAISO should provide hybrid resources with optional forecasting of the VER component to maximize flexibility.

4. Markets and Systems

Please provide your organization's feedback on the markets and systems topic as described in the straw proposal.

5. Ancillary Services

Please provide your organization's feedback on the ancillary services topic as described in the straw proposal. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

6. Metering and Telemetry

Please provide your organization's feedback on the metering and telemetry topic as described in the straw proposal.

7. Resource Adequacy

Please provide your organization's position on the Resource Adequacy topic as described in the straw proposal.

AWEA appreciates the CAISO's efforts to define default Qualifying Capacity (QC) rules for RA counting of hybrid resources. CAISO's proposed counting rules for hybrid resources (which would rely on the underlying QC of the resource components, limited to the interconnection rights) appears reasonable. AWEA looks forward to continuing discussions on QC for hybrid resources in this initiative and in the CPUC's RA proceeding.

Additional comments

Please offer any other feedback your organization would like to provide on the Hybrid Resources Initiative.