



Stakeholder Comments Template

Resource Adequacy Revised Straw Proposal

This template has been created for submission of stakeholder comments on the *Resource Adequacy Revised Straw Proposal* that was published on July 1, 2019. The proposal, stakeholder meeting presentation, and other information related to this initiative may be found on the initiative webpage at:

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

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on July 24.

Submitted by	Organization	Date Submitted
<i>Danielle Osborn Mills</i>	<i>American Wind Energy Association (AWEA)- California</i>	<i>July 24, 2019</i>

Please provide your organization's comments on the following issues and questions. Please explain your rationale and include examples if applicable.

1. System Resource Adequacy

- Please provide your organization's feedback on the *Determining System RA Requirements* as described in *Section 5.1.1*.

- Please provide your organization's feedback on the *Forced Outage Rates and RA Capacity Counting* as described in *Section 5.1.2*.

- Please provide your organization's feedback on the *System RA Showings and Sufficiency Testing* as described in *Section 5.1.3*.
- Please provide your organization's feedback on the *Must Offer Obligation and Bid Insertion Modifications* as described in *Section 5.1.4*.
- Please provide your organization's feedback on the *Planned Outage Process Enhancements* as described in *Section 5.1.5*.
- Please provide your organization's feedback on the *RA Import Provisions* as described as described in *Section 5.1.6*.
- Please provide your organization's feedback on the *Maximum Import Capability Provisions* as described in *Section 5.1.7*.

In summary, please provide your organization's position on System Resource Adequacy (Section 5.1). (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

AWEA-California is not providing comments on the System Resource Adequacy portion of the proposal at this time. AWEA-California may provide comments and positions at a later date, as this initiative moves forward.

2. Flexible Resource Adequacy

- Please provide your organization's feedback on the *Identifying Flexible Capacity Needs and Requirements* as described in *Section 5.2.1*.
- Please provide your organization's feedback on the *Identifying Flexible RA Requirements* as described in *Section 5.2.2*.
- Please provide your organization's feedback on the *Setting Flex RA Requirements* as described in *Section 5.2.3*.
- Please provide your organization's feedback on the *Establishing Flexible RA Counting Rules: Effective Flexible Capacity Values and Eligibility* as described in *Section 5.2.4*.

AWEA-California appreciates CAISO's consideration of establishing Flexible RA counting rules, especially as those rules relate to wind, solar and storage resources. As we understand the current proposal, it would utilize a different rule for determining the Effective Flexible Capacity (EFC) for solar resources than for other variable energy resource types. With respect to wind and other non-solar VERS, the current proposal would determine those resources' EFC as the dispatchable, economically bid portion of the resource's UCAP (which is equal to its NQC, which is, in turn, derived from the ELCC established by the CPUC). In general, this appears to be a reasonable approach for counting the EFC of variable energy resources.

However, it is important to recognize that relying primarily on the ELCC calculation to determine EFC, particularly for wind, will require accurate and appropriate ELCC determination by the CPUC going forward. AWEA-California believes it will be appropriate, if the CAISO's EFC counting proposal is adopted, for the CPUC to consider modifications to (and more granular determination of) the ELCC calculation for wind, in particular. It will be important for the ELCC to appropriately recognize the ELCC (and associated reduction in net load ramps) that is provided by regional wind resources and by offshore wind.

In addition to consideration of more granular ELCC's by the CPUC, AWEA-California seeks additional information from CAISO on the proposed EFC counting rules for solar resources. As a general principle disparate treatment of a particular resource type should be avoided. Therefore, AWEA-California has reservations about the proposed unique treatment for counting EFC for solar resources.

We understand the CAISO's rationale for proposing this different treatment for solar is that CAISO is seeking to account for the flexibility that can be provided by solar resources, especially in non-summer months, when those solar resources are curtailed to help smooth out the net load ramp. During non-summer months, say in the spring, solar's ELCC may be low (e.g. 5-10% of nameplate capacity). However, if that solar resource curtails its output in that month, it can help to reduce the net load curve by much more than its ELCC, thereby providing flexibility to the CAISO. It is reasonable for CAISO to seek a flexible capacity counting provision that takes this type of flexibility contribution, when it is made, into account.

AWEA seeks additional discussion and consideration regarding this proposal during the next set of workshops.

- Please provide your organization's feedback on the *Flexible RA Allocations, Showings, and Sufficiency Tests* as described in *Section 5.2.5*.
- Please provide your organization's feedback on the *Flexible RA Must Offer Obligation Modifications* as described in *Section 5.2.6*.

In summary, please provide your organization's position on Flexible Resource Adequacy (Section 5.2). (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

3. Local Resource Adequacy

- Please provide your organization's feedback on the *Local Capacity Assessments with Availability Limited Resources* as described in *Section 5.3.1*.

- Please provide your organization's feedback on the *Meeting Local Capacity Needs with Slow Demand Response* as described in *Section 5.3.2*.

In summary, please provide your organization's position on Local Resource Adequacy (Section 5.3). (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

AWEA-California is not providing comments on the Local Resource Adequacy portion of the proposal at this time. AWEA-California may provide comments and positions at a later date, as this initiative moves forward.

4. Backstop Capacity Procurement Provisions

- Please provide your organization's feedback on the *Capacity Procurement Mechanism Modifications* as described in *Section 5.4.1*.

- Please provide your organization's feedback on the *Reliability Must-Run Modifications* as described in *Section 5.4.2*.

- Please provide your organization's feedback on the *UCAP Deficiency Tool* as described in *Section 5.4.3*.

In summary, please provide your organization's position on Backstop Capacity Procurement Provisions (Section 5.4). (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

AWEA-California is not providing comments on the Backstop Capacity Procurement Provisions portion of the proposal at this time. AWEA-California may provide comments and positions at a later date, as this initiative moves forward.

Additional comments

Please offer any other feedback your organization would like to provide on the Resource Adequacy Revised Straw Proposal.