Energy Storage and Distributed Energy Resources (ESDER) – Storage Default Energy Bid (DEB)

Draft Final Proposal
Stakeholder Web Conference
September 22, 2020
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<td>Welcome and Introduction</td>
<td>Jimmy Bishara</td>
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<td>10:05 – 10:40</td>
<td>Storage Default Energy Bid Formulation</td>
<td>Gabe Murtaugh</td>
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<td>10:40 – 11:35</td>
<td>Updates to the DA Default Energy Bid</td>
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<td>Exemption from Market Power Mitigation for Small Storage</td>
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ISO Policy Initiative Stakeholder Process

**PROPOSAL DEVELOPMENT**
- Issue paper
  - Straw proposal
- Draft final proposal
  - Draft business requirement specification
  - Draft tariff
- Stakeholder input

**DECISION**
- Final proposal
  - ISO Board
    - EIM Governing Body
  - Tariff filing
  - FERC

**IMPLEMENTATION**
- Business practice manual revisions
- Market simulation
- Go Live

*This represents the typical process, and often stages of the process run in parallel.*

We are here
## Revised schedule for ESDER tracks

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<tr>
<th>Date</th>
<th>Milestone</th>
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<tr>
<td>Aug 21</td>
<td>ESDER 4 Final Proposal Published</td>
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<td>Sept 8</td>
<td>Final MSC Opinion Published</td>
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<tr>
<td>Sept 15</td>
<td>Post Draft Final Proposal for ESDER DEB</td>
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<td>Sept 22</td>
<td>Stakeholder Meeting</td>
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<td>Sept 30/Oct 1</td>
<td><strong>Board of Governors – ESDER 4</strong></td>
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<td>Oct (TBD)</td>
<td>Post Final Proposal for ESDER DEB</td>
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<td>Dec 1/2</td>
<td><strong>EIM Governing Body – ESDER DEB</strong></td>
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<td>Dec 16/17</td>
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DEFAULT ENERGY BID FORMULATION
The ISO will apply market power mitigation to energy storage resources, and offer these resources a DEB

- The proposed default energy bid for energy storage resources estimates marginal costs based on three primary cost categories:
  - 1) Energy costs and losses, 2) Cycling costs, 3) Opportunity costs

**Previous Formulation:**

\[
\text{Storage DEB} = \max \left( \frac{En \delta}{\eta} + \rho, OC_\delta \right) \times 1.1
\]

Where:

- \( En \): Estimated cost for resource to buy energy
- \( \delta \): Energy duration
- \( \eta \): Round-trip efficiency
- \( \rho \): Variable cost
- \( OC \): Opportunity Cost
The ISO acknowledges that the proposed DEB is a first step to preventing the exercise of market power

- Mitigation will be applied to the entire bid curve
- Mitigation will not decrease schedules or hours when ‘downward’ market power may be exerted
  - The ISO will address this in future updates of the default energy bid
- Market power mitigation does not mitigate to a “spread”
- Actual energy purchase prices are not considered

- Additional discharge scheduled in the day-ahead market, during mitigated hours, may imply additional charging earlier in the day
MSC RECOMMENDATIONS
Formal opinion from MSC was insightful and included more detail than discussed in previous meetings

• The storage DEB was discussed at four MSC meetings
  – ISO policy team had many additional off-line discussions with the MSC
• MSC proposed two improvements to the default energy bid that the ISO is considering
  – Setting a limit for ‘small’ storage resources that exempt them from being subject to the default energy bid
  – Not including the opportunity cost in the DA default energy bid formula
• MSC discussed many facets of an ‘ideal’ solution
• MSC noted additional features with the end of hour parameters could help to correctly value state of charge at the end of the real-time optimization horizon
  – Prices that change based on state of charge
  – Pricing for stored energy ($/MWh) at the end of hour
The MSC offered additional potential DEB changes that could be considered by the ISO in the future.

- MSC proposed storage resources not include charging costs in the DEBs, which could distort market awards:
  - The ISO is not inclined to include this change, as this has been discussed with stakeholders early in this initiative.
  - ISO may reexamine this if making large-scale changes to the DEB later.

- MSC emphasizes the need for participants to control the value of the state of charge at the end of the horizon:
  - With expected prevailing market prices, this may not be necessary.
PROPOSED CHANGES
The ISO includes two changes to the default energy bid from the previously proposed ESDER policy

1. Update the day-ahead default energy bid so that it does not include opportunity cost
   - MSC identified that these costs were not needed in the day-ahead default energy bid
   - These costs will continue to be observed in the real-time market, this is important because of the shorter look-ahead horizon

2. Exclude ‘small’ storage resources from being subject to the ISO market power mitigation logic tools
The ISO proposes an update to the formulation of the day-ahead default energy bid

**Proposed DA DEB Formulation:**

\[
DA \text{ Storage DEB} = \left(En_{\delta/\eta} + \rho \right) * 1.1
\]

- This formulation does not include the opportunity cost
  - The opportunity cost is implicitly assumed in the day-ahead market
- Day-ahead market schedules the resource to charge when prices are low and discharge when prices are high
- This formulation continues to consider the cost of the resource to charge and the variable cost of the resource for operation
  - Resource will only receive discharge schedules if prices are sufficient for economic dispatch, considering these costs
The ISO is planning to exclude small storage resources from market power mitigation

• MSC argued that this was practical for storage resources for two reasons:
  – Low benefits from mitigating small storage resources
  – Potentially high negative consequences for mitigating storage resources due to rapidly changing storage technology

• In light of this recommendation, the ISO proposes to offer such a safe harbor

• The ISO proposes to not apply market power mitigation to resources smaller than 5 MW and that do not have an ultimate parent that is a ‘net-supplier’
Next steps

- All related information for the ESDER initiative is available here: https://stakeholdercenter.caiso.com/StakeholderInitiatives/Energy-storage-and-distributed-energy-resources

- Please submit stakeholder written comments on today’s discussion and the hybrid resources draft final proposal by October 6, 2020

**Important – Please review new process for submitting comments**

- Provide comments using the new stakeholder commenting tool

- First-time users must register using their email address in order to submit comments on initiatives

- The commenting tool is located on the Stakeholder Initiatives landing page (click on the “commenting tool” icon): https://stakeholdercenter.caiso.com/StakeholderInitiatives