

Submitted by	Company	Date Submitted
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The Center for Energy Efficiency and Renewable Technologies (CEERT) offers the following comments on the 2018 Policy Initiatives Draft Roadmap and Final Catalog. CEERT previously submitted comments with Renewable Northwest on the Draft Policy Initiatives catalog¹. In these comments, CEERT advocated that the “selection of near-term initiatives be guided by the big picture trends and tasks”. CEERT stated it was supportive of initiatives that enhanced “the flexibility of the grid through either better enabling clean resources to participate in CAISO markets or increasing the fluidity between CAISO and other balancing authorities in the West”, as well as a “holistic reevaluation of the Resource Adequacy policies”. CEERT is pleased that the Draft Roadmap encompasses all of these goals.

CEERT is strongly supportive of 15-minute granularity in the day-ahead market, as well as the day-ahead flexible reserve product. Fifteen-minute granularity will help mitigate some uncertainty between the day-ahead and real-time markets, while the day-ahead flexible reserve product will ensure a market mechanism is available to compensate resource appropriately for their ability and willingness to provide flexible capacity.

CEERT is also supportive of extending day ahead market functions to other energy imbalance market entities. Should the design be acceptable for all entities and state regulators, it could be a workable solution that significantly enhances regional coordination in West, allowing more cost effective integration of renewable technologies.

CEERT is pleased that Resource Adequacy will be a primary focus of CAISO initiatives in the coming year. As California transitions to a low-carbon grid, the framework for ensuring reliability will need to change to reflect the changing resources relied upon and reflect California’s climate and energy goals. The new framework must strike a balance between allowing unneeded fossil resources to retire and maintaining the resources needed as the California grid decarbonizes. Within these initiatives, it is vital that the CAISO reform the local capacity assessment process to account for preferred resource solutions. The CAISO should also work the California Energy Commission to fix sub-area forecasting and work with California Public Utilities Commission to allow hybrid products, such as storage plus demand response, and appropriately count solar through an appropriate effective load carrying capacity.

¹ <https://www.caiso.com/Documents/CEERTComments-2018DraftPolicyInitiativesCatalog.pdf>

CEERT is also supportive of the planned “storage as a transmission facility” stakeholder process. Determining the best way to provide services from storage, of all scales, will be a critical element to California reaching its climate and energy goals in the electric sector.