Attachment A

Stakeholder Processes: Resource Adequacy Enhancements, and Proxy Demand Resource - resource adequacy clarifications initiatives

Summary of Submitted Comments

Stakeholders submitted seven rounds of written comments to the ISO on the following dates:
RA Enhancements initiative

- Round One: November 15, 2018
- Round Two: February 5, 2019
- Round Three: April 23, 2019
- Round Four: July 25, 2019
- Round Five: October 25, 2019

PDR – resource adequacy clarifications initiative

- Round Six: March 8, 2020
- Round Seven: April 17, 2020

This matrix summarizes the most recently submitted stakeholder comments on the final slow demand response proposal included in the PDR - resource adequacy clarifications initiative.

Stakeholder comments are posted at: http://www.caiso.com/InitiativeDocuments/Stakeholder-Comments-ProxyDemandResource-ResourceAdequacyClarifications-FinalProposal.pdf

Other stakeholder efforts include:
PDR – RA clarifications initiative

- Stakeholder Conference Call: April 3, 2020

- Stakeholder Conference Call: April 28, 2020

Resource Adequacy Enhancements

- Stakeholder Conference Call: October 30, 2018
- Stakeholder Meeting: January 23, 2019
- Stakeholder Meeting: April 8, 2019
- Stakeholder Meeting: July 8, 2019
- Stakeholder Meeting: October 9, 2019

ISO/CPUC Joint Workshops and CPUC Supply Side Working Group

- 2016 - 2019

Management Proposal	California Efficiency + Demand Management Council	California Large Energy Consumers Association (CLECA)	DMM	PG&E	SCE	SDGE	Management Response
This is the proposal element requiring tariff change: Slow demand response pre-contingency dispatch settlement using day-ahead market bid price and resource specific, real-time fifteen minute LMP	No Comment	No Comment	No Comment	No Comment	No Comment	No Comment	

Management Proposal	California Efficiency + Demand Management Council	California Large Energy Consumers Association (CLECA)	DMM	PG&E	SCE	SDGE	Management Response
Pre-contingency dispatch methodology of slow demand response after conclusion of the day-ahead market	"Council" supports the ISO proposal with the following understanding: 1) post day ahead exceptional dispatch decision will be made by approx. 3 p.m. 2) only those PDRs on a supply plan providing local resource adequacy will be subject to pre-contingency dispatching to maintain local reliability 3) slow demand response resources shown for local resource adequacy on a supply plan will be recognized in its Local Capacity Technical Studies.	No Comment	Does not support, stating "issues regarding how demand response resources are modeled in the market should be resolved before moving forward with the proposed dispatch process." DMM has a broader concern about the cumulative effect of energy-limited or availability-limited resources being relied upon to meet an increasing portion of resource adequacy requirements	No Comment	No Comment	No Comment	The ISO continues to work with demand response stakeholders to ensure they are appropriately modeled in the market. This effort, however, is focused on operationalizing existing demand response resources that require advance notification of actual load reduction, rather than a commitment to be ready to reduce load. These resources are currently counting for local resource adequacy by the local regulatory authority but the ISO cannot access them within the time required for local contingencies. The ISO is working in its Resource Adequacy Enhancements initiative and in CPUC proceedings to implement policies that ensure energy sufficiency from the shown resource adequacy fleet.

Management Proposal	California Efficiency + Demand Management Council	California Large Energy Consumers Association (CLECA)	DMM	PG&E	SCE	SDGE	Management Response
Pre-contingency dispatch methodology will only consider slow demand response shown to the ISO as resource adequacy				PG&E opposes ISO's proposal that only slow demand response that is shown on a supply plan should count for local resource adequacy		Resolution of whether to show Investor Owned Utility demand response on supply plans requires California Public Utilities Commission decision. It is pre-mature to require the IOU PDRs on the supply plan because the ISO has not implemented the weather sensitive demand response solution as part of the energy storage distributed Energy resources Phase 4 ("ESDER 4") initiative. In the interim, IOUs could work with the ISO to provide a list of IOU-specific PDR resources and the net qualifying capacity values to better coordinate and achieve the ISO's solution.	ISO systems require visibility of specific resources being relied upon for local RA to determine which resources are available for dispatch through the ISO's proposed methodology. The only way to provide this visibility is through the supply plans. Requiring all resource adequacy demand response to be shown on supply plans also ensures all resource adequacy resources are subject to the same resource adequacy tariff provisions, such as the must offer obligation and Resource Adequacy Availability Incentive Mechanism treatment.

Management Proposal	California Efficiency + Demand Management Council	California Large Energy Consumers Association (CLECA)	DMM	PG&E	SCE	SDGE	Management Response
Methodology will not pre-contingency dispatch reliability demand response resources	No Comment	CLECA opposes, stating Reliability Demand Response Resource providing part of their full response capability within 20 minutes should count for local resource adequacy. Recognizes that to resolve their issue "CPUC resource adequacy accounting rules may be required…to have two resource adequacy values, one for local and another for system."	No Comment	PG&E recommends ISO work with stakeholders on a proposal to estimate the ramping value of resources (i.e., the ramping value of PG&E's Base Interruptible Program in 20 minutes which participates as reliability demand Response Resource) and approach to counting these resources for local resource adequacy.	SCE recommends the ISO delay adopting its Slow DR proposal until the CPUC issues a decision. ISO should work with the CPUC and stakeholders to develop proposal to estimate slow RDRR ramping value (i.e. the amount of load reduction that can be relied upon to have curtailed within the 20 minute time-frame) and count them as local resource adequacy.	No Comment	ISO agrees that the portion of a resource that reliably responds within the required period (if less than 100%) could be counted for local resource adequacy, however, there is no means by which this resource can also obtain a higher value for counting of its system RA as comments request. Under the proposal, RDRRs with the capability to obtain curtailment response within 20 minutes could qualify for local resource adequacy in the amount that is available within that time, however, this value would also have to be reflected as the resources system resource adequacy value, per current CPUC resource adequacy rules when reflected on a resource adequacy supply plan.