

 California ISO	Market and Infrastructure Policy	Template Version:	1
		Document Version:	0
Policy Initiatives Catalog Submission Form		Date Created:	6/1/2017

California ISO Policy Initiatives Catalog Submission Form

This purpose of this form is to propose potential policy initiatives that require a stakeholder process and typically require tariff changes. Do not use this form to request or propose process improvements or administrative changes. Such requests should be made through your Customer Service Representative or Account Manager

Date: 7/31/2020

Submitter Information

Organization	Contact Name	E-mail	Phone
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Please provide a title for the issue.

Curtailement Prioritization for Deliverable Projects

Please provide a summary description of the issue (i.e. 500 words)

Currently, there is a disconnect between deliverability status and priority in market dispatch. Projects that are designated as Energy-Only have the same priority in the real-time market as resources with FCDS that are complying with must-offer obligations. Further, CAISO's recent deliverability enhancements tariff filing at FERC was only partially accepted, leaving the new Off-Peak Deliverability Status with ambiguity as to what the status means for interconnection customers that choose to fund the upgrades to avoid excessive curtailment. There should be a basis for prioritizing curtailment for those generators that achieve OPDS status.

The CAISO should initiate a new process that looks to create distinct priorities for curtailment based on deliverability. For example, FCDS would have highest priority and be the last to face curtailment, while Energy-Only projects would have the lowest priority. Aligning curtailment and deliverability may be an effective method to incentivize much-needed additional transmission investment, and incorporating OPDS into this discussion of curtailment priority can address the policy gap created when FERC rejected CAISO's proposal to tie OPDS status to the ability to self-schedule.

Please provide any data/information available that would characterize the importance or magnitude of the issue.

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