

## Stakeholder Comments

Submitted by	Company or Entity	Date Submitted
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### **Comments and Questions** **2021 Budget and Grid Management Charge Process**

The City of Santa Clara, California, dba Silicon Valley Power (“SVP”) and the Modesto Irrigation District (“MID”) thank the California Independent System Operator Corporation (“CAISO”) for the opportunity to submit comments and questions in connection with the CAISO’s 2021 Budget and Grid Management Charge (“GMC”) Process, and July 29, 2020 webconference. SVP and MID raise below questions which they request that the CAISO answer, as well as a comment concerning the SCID fee at the end of this document:

Regarding CAISO’s 2020-2021 Preliminary Project Listing:

- Does the “Day-ahead reliability tool phase 2” relate to Day-Ahead Market Enhancements (“DAME”) implementation and, if so, what does the project entail?
- Does “Resource adequacy enhancements” include upgrade of CAISO’s Outage Management System (“OMS”), or will such expenditures be deferred until the unforced capacity (“UCAP”) policy is approved at FERC as suggested during a recent RA Enhancements meeting?
- Regarding the “Transmission access charge (TAC) billing” project, last year CAISO provided during the stakeholder budget process that this project was the same as the “TAC Structure Enhancements” project, and that CAISO would rename the initiative to the latter. Seeing as CAISO has not done so, we seek confirmation that these two project names continue to be used interchangeably into the 2021-2020 project listing.
- What projects is EDAM associated with, if any, in the Preliminary Project listing for 2021-2022 or Active Project Listing as of June 30, 2020?

- Why does “ESDER Phase 4” appear on the list as that initiative draws to a close?
- Last summer during the budget process, CAISO explained the “Focus on Customer Service and Other Costs” project classification in its 2019 quarterly financials included an “external training program” slated for end of 2019, though that project did not appear in the Final 2020 Budget book issued in December 2019. Does the external training program that was presumably deferred appear on the Preliminary Project Listing for 2021-2022 as “expand external capability for hands-on training”, or elsewhere in the Preliminary Project listing?
- What is “Incorporation of operations non-core tools into final destination?”

Regarding CAISO’s active capital projects listing:

- What does the “2020 Hardware & Software Purchases” project approved at \$3 million but 0% completed cover?
- What does “OSI 2020 Non Capital” approved at \$1.15 million and 25% complete cover?

Regarding CAISO’s financial summaries:

- Referring to the quarterly financial reports posted for 2020 (PDF 4), why does the YTD Budget for full-time employees change from Q1 to Q2? CAISO hired 8 new employees in Q2—in what department, and does CAISO anticipate future hiring to fill the YTD budget of 657 personnel, which is shown at 633 currently? If so, in what department?
- Referring to the quarterly financial reports posted for 2020, what were the most significant (cost-wise) capital projects the Corporate Management Committee approved in Q1 2020 (\$9M) and in Q2 2020 (\$13.8M)?

In addition, regarding the proposed 2021 monthly SCID fee increase to \$1,500 per month from \$1,000 per month:

- MID/SVP support the request of Amber Power and ETRACOM that the CAISO provide the calculations behind the incremental costs. MID/SVP share concerns that the resulting new fee amount would have a greater impact on smaller entities, and may be prohibitive towards creating an SC representing a small generating facility (such as some small renewable facilities). Further, MID/SVP submit that some consideration be given to exploring an alternative monthly SCID fee methodology or application, where higher SCID fees initially exist over the first year of SC existence,

but where monthly SCID fees would taper off in future years consistent with a reduction in costs to the CAISO of maintaining the SCIDs once established.