

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Oversee the
Resource Adequacy Program, Consider
Program Refinements, and Establish Forward
Resource Adequacy Procurement Obligations

Rulemaking 19-11-009
(Filed November 7, 2019)

**REPLY COMMENTS ON PROPOSED DECISION ON TRACK 3B.2 ISSUES:
RESTRUCTURE OF THE RESOURCE ADEQUACY PROGRAM OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Roger E. Collanton
General Counsel
Anthony Ivancovich
Deputy General Counsel
Jordan Pinjuv
Senior Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom California 95630
Tel.: (916) 351-4429
jpinjuv@caiso.com

Date: July 6, 2021

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I. Introduction

The California Independent System Operator Corporation (CAISO) provides reply comments on the proposed *Decision on Track 3B.2 Issues: Restructure of the Resource Adequacy Program* (Proposed Decision). The CAISO appreciates the opportunity to provide reply comments and looks forward to working with the Commission to refine the resource adequacy program to meet evolving grid needs.

II. Discussion

A. The Commission Should Modify the Proposed Decision to Allow Parties to Consider Elements of Both Slice-of-Day Proposal and the Joint Proposal to Ensure the Restructured Resource Adequacy Program Can Cover Multi-Day Reliability Events.

The CAISO agrees with parties¹ recommending the Commission continue to consider the Southern California Edison/California Community Choice Association (SCE/CalCCA) joint proposal as a viable option during the next phase in this proceeding. Furthermore, the CAISO agrees with parties² stating the SCE/CalCCA joint proposal more appropriately addresses multi-day reliability events compared to the single representative day in the Pacific Gas and Electric's Slice-of-Day framework. To create a durable future resource adequacy program, it is increasingly necessary to consider and plan for multi-day

¹ California Community Choice Association, Opening Comments on Resource Adequacy Track 3B.2 Proposed Decision, R.19-11-009, June 30, 2021, pp. 3-4; California Energy Storage Alliance, Opening Comments on Resource Adequacy Track 3B.2 Proposed Decision, R.19-11-009, June 30, 2021, pp. 3-7 (CESA Opening Comments); Hydrostor, Opening Comments on Resource Adequacy Track 3B.2 Proposed Decision, R.19-11-009, June 30, 2021, p. 7. (Hydrostor Opening Comments).

² CESA Opening Comments, p.7; Hydrostor Opening Comments, p. 3.

reliability events with little to no solar and/or wind production and to incentivize resource procurement to maintain reliability during these events. Therefore, the Commission should modify the Proposed Decision to allow parties additional time to consider fully which elements of each proposal can best address the four key principles noted in the Proposed Decision³, rather than prematurely foreclosing such consideration.

III. Conclusion

The CAISO appreciates the opportunity to provide comments on the Proposed Decision and looks forward to working with the Commission and parties in workshops to discuss these critical issues.

Respectfully submitted

By: /s/ Jordan Pinjuv

Roger E. Collanton

General Counsel

Anthony Ivancovich

Deputy General Counsel

Jordan Pinjuv

Senior Counsel

California Independent System

Operator Corporation

250 Outcropping Way

Folsom, CA 95630

Tel: (916) 351-4429

Fax: (916) 608-7222

jpinjuv@caiso.com

Attorneys for the California Independent
System Operator Corporation

Dated: July 6, 2021

³ California Public Utilities Commission, *Proposed Decision on Resource Adequacy Track 3B.2 Issues: Restructure of the Resource Adequacy Program*, R.19-11-009, June 10, 2021, pp. 25-26.