

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

Order Instituting Rulemaking to Develop an
Electricity Integrated Resource Planning
Framework and to Coordinate and Refine
Long-Term Procurement Planning
Requirements.

Rulemaking 16-02-007
(Filed February 11, 2016)

**COMMENTS OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR CORPORATION**

Roger E. Collanton
General Counsel
Anthony J. Ivancovich
Deputy General Counsel
Anna A. McKenna
Assistant General Counsel
Jordan Pinjuv
Senior Counsel
California Independent System
250 Outcropping Way
Folsom, CA 95630
Tel: (916) 351-4429
Fax: (916) 608-7222
Email: jpinjuv@caiso.com

Dated: October 14, 2019

Table of Contents

I.	Introduction.....	1
II.	Discussion.....	1
III.	Conclusion	2

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

Order Instituting Rulemaking to Develop an
Electricity Integrated Resource Planning
Framework and to Coordinate and Refine
Long-Term Procurement Planning
Requirements.

Rulemaking 16-02-007
(Filed February 11, 2016)

**COMMENTS OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation (CAISO) hereby provides comments in response to the *Joint Motion of Enel X North America, Inc., Tesla, Inc., Sunrun Inc., Center for Energy Efficiency and Renewable Technologies, California Energy Storage Alliance, and Vote Solar to Establish a Schedule and Process for Determining the Capacity Value of Hybrid Resources* (Joint Motion), filed in this proceeding on September 27, 2019.

I. Introduction

The CAISO supports the Joint Motion's requests to adopt (1) a schedule and process for determining a qualifying capacity methodology for hybrid resources and (2) an interim methodology to determine qualifying capacity for hybrid resources. The CAISO supports an additive interim methodology as proposed by the CAISO at the Commission's September 6, 2019 workshop.

II. Discussion

As the Joint Motion highlights, the CAISO expects that hybrid resources will be essential to meeting the reliability needs identified in the Integrated Resource Planning (IRP) proceeding. There is currently a significant amount of hybrid resources in the CAISO's interconnection queue. Many of these resources combine battery storage and variable energy resources. The Commission should adopt an interim qualifying capacity counting methodology to appropriately gauge how potential hybrid resources can meet system reliability needs.

At the Commission's September 6, 2019 Resource Adequacy workshop, the CAISO proposed that the Commission adopt an interim qualifying capacity counting methodology for

hybrid resources based on additive qualifying capacity of the separate components. Specifically, the interim qualifying capacity values for hybrid variable energy and battery storage resources should be set at the effective load carrying capability (ELCC) of the variable energy component plus the four-hour sustained output of the storage component. As with any other generation facility, net qualifying capacity will be subject to deliverability and capped at the interconnection capacity rights. The CAISO recommends that the Commission adopt this interim qualifying capacity methodology as soon as possible to expedite procurement necessary to meet near-term reliability needs.

Concurrently, the Commission should adopt a schedule to determine a permanent qualifying capacity methodology for hybrid resources.

III. Conclusion

The CAISO appreciates the opportunity to provide comments and supports the Joint Motion's requests to adopt (1) a schedule and process for determining a qualifying capacity methodology for hybrid resources and (2) an interim methodology to determine qualifying capacity for hybrid resources.

Respectfully submitted,

By: /s/ Jordan Pinjuv

Roger E. Collanton
General Counsel

Anthony J. Ivancovich
Deputy General Counsel

Anna A. McKenna
Assistant General Counsel

Jordan Pinjuv
Senior Counsel

California Independent System
250 Outcropping Way

Folsom, CA 95630

Tel: (916) 351-4429

Fax: (916) 608-7222

Email: jpinjuv@caiso.com

Attorneys for the California Independent
System Operator Corporation

Date: October 14, 2019