

## Stakeholder Comments Template

### Subject: Comments for CAISO's Executive Appeals Committee Hearing – Process for Reconsidering PRR 1280

Submitted by	Company	Date Submitted
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Western Area Power Administration (WAPA) is a federal agency responsible for marketing hydropower generated by the federal Central Valley Project (CVP) to meet its statutory responsibilities to serve project-use energy pumping requirements and market available hydropower generation under its marketing plan to preference power allottees. In Northern California, WAPA serves load in both the Balancing Authority of Northern California and the CAISO. WAPA delivers its generation from many large and small hydro facilities of the CVP to its loads. WAPA owns, operates, and maintains an extensive high voltage transmission network extending to the load center of Northern California.

WAPA appreciates the opportunity to provide comments on the CAISO's BPM change PRR 1280 following the Executive Appeals Committee decision on December 9, 2020, and the subsequent meetings between WAPA and CAISO staff to discuss requirements for and implications of the showing of Resource Adequacy Capacity on an RA Supply Plan.

In its stakeholder brief to the December 1, 2020 Appeals Committee Hearing, WAPA stated the following items. WAPA provides its Annual and Monthly showing of RA resources to meet System RA obligations through the Local Regulatory Authority (LRA) System RA credits template. WAPA as a Load Serving Entity and Scheduling Coordinator provides the CAISO with a showing consistent with the criteria adopted by WAPA's LRA Plan to determine qualifying resource types and the Qualifying Capacity from such resources. WAPA's LRA Plan designates CVP generation and Liquidated Damages contracts for imported energy as qualifying resources with Qualifying Capacity. WAPA markets power in accordance with specific Federal statutes, regulations, and policies.

There were a number of follow up meetings between WAPA and CAISO staff to discuss the requirements for including RA resources on RA Supply Plans. WAPA appreciates CAISO's willingness to discuss these matters and look for mutual resolutions. While it was identified that WAPA now has the resource IDs for imports and could presumably start adding them to RA Supply Plans. WAPA has raised concern regarding a CAISO action plan informing WAPA of the transition timeline. WAPA has concerns on the following outstanding issues: 1) resource modeling needs or changes required in the Master File, 2) the lack of WAPA resources modeled in the Outage Management System, and 3) limited import capability allocations in 2021, with only one of the WAPA-CAISO interties with an assignment. WAPA's concerns of not addressing

the outstanding issues may result in an inability to submit appropriate schedules or bids and resource outages if the applications do not have adequate and appropriate modeling of the resources. PRR 1280 introduces fundamental changes in WAPA's business processes, which necessitate training and new process documentation, and this change possibly has impact to workload management. WAPA appreciates that CAISO provided approaches to training, including access to knowledge articles, as well as offering to provide, at cost, a tailored training for WAPA staff to address knowledge and process gaps.

WAPA is concerned of the impact of PRR 1280 to the restrictions to what WAPA can make available to the CAISO markets in view of the specific Federal statutes, regulations, and policies that WAPA must follow in the marketing of power from the CVP. The CVP is an integrated and multipurpose hydroelectric resource and has inherent limitations that must be observed. WAPA believes that CAISO needs to take these into account and provide its CVP-backed resources access to outage cards.

WAPA does not expect the implementation of PRR 1280 to contravene any provisions of WAPA's LRA Plan. However, if the implementation of PRR 1280 does result in inconsistency with WAPA's LRA Plan, it will take time to resolve such inconsistency. WAPA's LRA Plan was developed in accordance with Federal procedural requirements under the Administrative Procedure Act. Revisions to the LRA Plan may be required to be undertaken through the same process. If so, WAPA would need additional time to implement the necessary modifications. Any major changes to the way WAPA currently does business requires time for WAPA to analyze the necessary changes, train staff, and implement such changes.

WAPA looks forward to continuing discussions with CAISO to resolve these matters.