

Decision on reliability must-run and capacity procurement mechanism enhancements proposal

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Board of Governors Meeting General Session March 27, 2019 Capacity is procured through resource adequacy program and ISO Capacity Procurement Mechanism and Reliability Must-Run Agreements backstop provisions to ensure reliable grid operations.

RA program

Primary capacity procurement

CPM — ISO backstop of the RA program

Voluntary procurement

Short-term to address a reliability need:

- * Deficiency in RA showings
- * Exceptional dispatch of non-RA
- * Significant event

RMR



Procure resources for reliability need

Mandatory procurement

Longer-term to address a reliability need



Changes in the industry have created a need to update ISO's backstop capacity procurement authority.

- Meeting state's environmental goals has put conventional resources under financial stress due to declining energy market revenues
- Observed need for increased backstop procurement
- Current provisions need to be updated so critical resources continue to be available for operational needs
- At November 2017 Board meeting Management committed to undertake holistic review of backstop provisions



Management proposes several enhancements to ISO's backstop capacity procurement authority.

- 1. Clear rules for when RMR or CPM procurement is used
 - CPM used to backstop RA program
 - RMR used to address resources at risk of retirement that are needed for a period of time for reliability
- Advance notice to stakeholders of upcoming retirements to allow procurement by load serving entities in lieu of ISO procurement



Enhancements (continued).

3. More appropriate CPM pricing above soft-offer cap

- Changing from cost of service to going-forward fixed cost plus 20%
- Aligns with CPM pricing below cap

4. Simplified RMR structure

- All retirement procurement done through RMR tariff
- Single option for compensation: full cost of service
- Use same performance mechanism as is used for other capacity



Enhancements (continued).

- 5. Formal affidavit notice to retire or mothball to mitigate potential gaming of RMR procurement
- 6. "Must-offer" obligation for RMR resources
- 7. Rate of return for RMR that reflects current market conditions
- 8. Streamlined and automated RMR settlement
- 9. Flexible Resource Adequacy credits for RMR resources



Stakeholder feedback:

- Agree RMR construct needs to be updated
- Support having one mechanism for all retirement-related backstop procurement (RMR)
- Concerned about resources being able to return to market after RMR service is over - "toggling" issue
- Request stronger requirements to mothball a resource
- Concerned RMR must-offer obligation will suppress prices and cause resources to run unnecessarily
- Concerned with using RAAIM "as is" for RMR



Stakeholder feedback:

- Request RMR compensation be decreased from <u>full</u> cost of service
- Agree price that can be bid for offers above CPM soft offer cap should be modified from current cost of service
- Some request different formula than what ISO proposes for price that can be bid above CPM soft-offer cap want lower price
- Request a lower CPM price, or alternatively use cost of service pricing, for 12-month CPM designations

Management recommends the Board approve the RMR and CPM enhancements proposal.

- Management believes its proposal will result in efficient backstop capacity procurement provisions for maintaining reliable grid operations
- Provides needed updates to backstop provisions
 - Clarifies and streamlines procurement processes
 - Updates compensation methodologies
 - Full cost of service compensation is consistent with FERC precedent given RMR designation is mandatory
 - Existing compensation rules address potential toggling between being RMR resource and market resource

