



American Wind Energy Association California Caucus Comments on the Dispatch Operating Target Tariff Clarification Initiative

Submitted via email to InitiativeComments@caiso.com
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The American Wind Energy Association California Caucus (ACC) appreciates the opportunity to comment on the California Independent System Operator's (CAISO) proposed tariff changes related to the Dispatch Operating Target (DOT) procedures. Given the strong interest and technical nature of this topic, ACC seeks additional opportunities for stakeholder review and input before the tariff changes are submitted to FERC. ACC also proposes some changes to the tariff language.

Generally, ACC understands that the tariff changes are not intended to change the CAISO's ability to curtail variable energy resources (VERs). Nevertheless, all stakeholders interested in this initiative would be better served by additional written information from the CAISO explaining the proposed changes to the tariff, the reason the changes/clarification are required, and whether these changes will modify CAISO's ability to curtail VERs. As ACC understands the proposed tariff changes, they would not materially alter the CAISO's ability to require VERs to adhere to their DOTs, but they will help in addressing the "feedback loop" that could cause CAISO's VER forecasts to migrate downward over time.

Additionally, while ACC understands that CAISO is following the "standard" tariff change stakeholder process, ACC believes that, given the sensitive nature of the topic, an expanded approach, with more opportunities for stakeholders to understand CAISO's intentions and provide feedback is needed. Therefore, ACC recommends that the CAISO extend and enhance this stakeholder process. Specifically, as discussed above, ACC requests that the CAISO issue a written summary explaining the need for these tariff clarifications and the implications (if any) to VERs. The CAISO should also provide empirical examples of how the tariff changes would affect VERs in several different scenarios. ACC also requests that the CAISO host one additional stakeholder comment period and stakeholder call before filing the tariff language with FERC.

Finally, while ACC members are still learning about the potential implications of the CAISO's proposed tariff changes and how - if at all - these changes may affect future curtailments, ACC provides the following initial recommendations on the CAISO proposal. ACC recommends modifications to the proposed tariff language to clarify that the CAISO will only implement the DOT flag indicating VERs must adhere to their DOTs under two simultaneous conditions: (1) when a System Emergency is in progress or imminent, *and* (2) after all economic bids have been exhausted.



Specifically, Section 34.13.1 should be modified as follows:

*Notwithstanding the requirement to follow Dispatch Instructions, an Eligible Intermittent Resource may produce to its capability, in excess of its Dispatch Operating Target, when its Dispatch Instruction is equal to its forecasted output. An Eligible Intermittent Resource in the process of developing a CAISO forecast pursuant to Section 3.1 of Appendix Q may produce to its capability, in excess of its Dispatch Operating Target, when its Dispatch Instruction is equal to its scheduled output. Notwithstanding the above, **consistent with Section 7.6 of the CAISO tariff, once all economic bids have been exhausted, and when a System Emergency is in progress or imminent**, the CAISO may issue an Operating Instruction directing the Eligible Intermittent Resource to follow its Dispatch Operating Target if necessary to maintain system reliability ~~consistent with Section 7.6 of the CAISO tariff~~. Upon receiving such an Operating Instruction, an Eligible Intermittent Resource must return to its Dispatch Operating Target and not generate in excess of its Dispatch Operating Target until the Operating Instruction expires. When such an Operating Instruction is in effect, Eligible Intermittent Resources must follow a linear ramp between Dispatch Operating Targets.*

ACC appreciates the opportunity to provide these comments and looks forward to working with the CAISO on this proposal.

Respectfully submitted,

/s/ _____

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