



Stakeholder Comments Template

CAISO RA Workshop: Current Processes and Interoperability with the CPUC's Slice of Day Reform

This template has been created for submission of stakeholder comments on the CAISO RA Workshop: Current Processes and Interoperability with the CPUC's Slice of Day Reform stakeholder call that was held on June 06, 2023. The meeting presentation and meeting recording for this initiative have been posted to the Miscellaneous stakeholder meetings [webpage](#).

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **June 20, 2023**.

Submitted by	Organization	Date Submitted
<i>(submitter name and phone number)</i> Mohan Niroula, 916-820-7774	<i>(organization name)</i> CDWR	<i>(date)</i> 06/19/2023

Please provide your organization's comments on the following issues and questions.

1. What feedback does your organization have on the CAISO's approach to treat the CPUC's Slice of Day reform 2024 (test year) as informational only?

CDWR supports CAISO's approach to treat the CPUC's test year as informational only. The test year may provide information that would be helpful in assessing impacts on the existing CAISO RA program.

2. What feedback does your organization have on the CAISO's approach to address compliance for the CPUC's Slice of Day reform in 2025 (implementation year) as a part of the broader Resource Adequacy (RA) Enhancements initiative?

CDWR supports the CAISO's approach to address compliance for the CPUC's Slice of Day (SOD) framework as a part of the broader RA enhancement initiative as it would be a major shift in policy, and may take considerable effort and time to work through and implement. The broader initiative should explicitly consider the needs of non-CPUC LRAs, particularly those with responsibility for unique loads such as CDWR.

3. Are there any key risks your organization has identified if the CAISO does not make any changes to the CAISO's RA program and processes for resource adequacy year 2024 or 2025, with respect to the CPUC's Slice of Day reform?

CDWR believes that a broader RA enhancements initiative would identify risks and develop measures to address those risks.

4. Is there a data analysis approach your organization has developed or analysis your organization recommends the CAISO should develop to analyze the CPUC's Slice of Day reform effort?

No comment.

5. What topics does your organization recommend the CAISO address in upcoming RA Enhancements working group meetings? Do you have a recommended prioritization?

At this time, CDWR does not have any recommended prioritization.

6. For non-CPUC jurisdictional LRAs, are there any changes occurring to your RA program in the next few years that the CAISO should be aware of?

Currently, CDWR does not have a plan to make changes. It is open to make changes based on how the broader RA enhancements initiative unfolds, recognizing the unique nature of CDWR's loads.

7. Please provide any additional comments you may have on the workshop discussion.

CDWR supports the CAISO's clarification that most of the RA processes will be maintained including the ability to increase the Net Qualifying Capacity (NQC) values on a monthly basis.