

CDWR comments on Reliability Services Working Group- December 10 Meeting

December 19, 2014

California Department of Water Resources (CDWR) respectfully submits the following comments with regard to the December 10 Working Group web-conference:

Exemption clarifications Tariff section 40.9.2 (slide 26):

To the extent a participating load resource RAAIM calculation model is too complex to accommodate, one alternative is to continue exemption from RAAIM as it is today.

Forced outage reporting rules:

There is no description of how a forced outage would apply to a participating load compared to a generating resource forced outage, either in the Tariff or the Business Practice Manual. For a generating resource, a forced outage would curtail the generation; however, it is unclear how that would be defined with regard to a pumping load. If a pump load does not exist during any time interval, and thus cannot offer a non-spin bid in the DAM and corresponding energy bid in the RTM, then there is no reliability concern caused by the non-existent load during that interval. The pump (otherwise not pumping) should not be required to be turned on just to offer non-spin and an energy bid to meet the RA must offer obligation. When a pump load does not exist at any time, it cancels out the need for RA capacity for itself during that time interval. For this reason, resources such as a participating load are not required to report outages. Therefore, forced outage reporting requirements as well as substitution and replacement requirements should not be applied to a participating load resource adequacy capacity. This treatment would be the same as it is today.

Updated spreadsheet posted:

CDWR understands that the updated spreadsheet (RAAIM Incentive calculation model) is a conceptual model for a generating resource availability calculation for generic and flexible RA. For a participating load RA resource, this model will need to be modified to accommodate conditions that the real time energy bid from a participating load is contingent upon day ahead demand schedule and day ahead non-spin ancillary service award. The second revised straw proposal includes the following provision:

6.13.4. Pumping Load

Unlike traditional capacity, pumping load must have a DA AS schedule in order to produce energy in the real-time. The ISO will only assess pumping load under the availability incentive mechanism if there is pumping load available. During the periods when there is no available load in the real-time, the ISO will exempt the capacity from the incentive mechanism in that interval.

Moreover, slides 22 and 23 do not include participating load; it should be included as a use-limited resource.

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