



Stakeholder Comments Template

Local Resource Adequacy with Availability-Limited Resources and Slow Demand Response Draft Final Proposal

This template has been created for submission of stakeholder comments on the *Local Resource Adequacy with Availability-Limited Resources and Slow Demand Response Draft Final Proposal* that was published on October 2, 2019. The proposal, stakeholder meeting presentation, and other information related to this initiative may be found on the initiative webpage at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/ResourceAdequacyEnhancements.aspx>

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on October 24, 2019.

Submitted by	Organization	Date Submitted
Jin Noh & Sergio Duenas jnoh@stroagealliance.com 510-665-7811 x 109	California Energy Storage Alliance (CESA)	October 24 th , 2019

Please provide your organization’s comments on the following topics. When applicable, please indicate your organization’s position on the topics below (Support, Support with caveats, Oppose, or Oppose with caveats). Please explain your rationale and include examples if applicable.

1. Local Assessments with Availability-Limited Resources

- Please provide your organization’s feedback on the *Local Assessments with Availability-Limited Resources* proposal as described in *Section 3*.

CESA supports with caveats the ISO's decision to provide information regarding the duration of Local Resource Adequacy (RA) needs in local areas and sub-areas. CESA considers that making data about potential capacity needs in energy terms (*i.e.*, MWh) available is valuable for LSEs seeking to bolster reliability in areas and sub-areas with considerable generation and/or transmission constraints. In the Draft Final Proposal, the ISO mentions that it is not directly proposing a change to the minimum four-hour requirement but is instead sharing

this information to generally guide resource procurement.¹ CESA shares the ISO's intention.

CESA, however, strongly opposes any cap on energy-limited resources based on these non-binding findings without consideration of stakeholder input. In the Draft Final Proposal, the ISO states that it will validate that the RA resources provided have enough energy to meet the needs for each individual area and sub-area; if that is not the case, the Draft Final Proposal says "CAISO will use the existing process to allow load serving entities to cure any deficiencies."² CESA is concerned that the ISO might consider limiting the pool of resources that can alleviate this issue based on the results of the Local Capacity Requirements (LCR) Study. Thus, the ISO should consider all resource types and classes equally, in a non-discriminatory fashion, to cover Local RA needs. CESA's past comments on this initiative have extensively spoken on this matter.³

2. Slow Demand Response

- Please provide your organization's feedback on the *Slow Demand Response* proposal as described in *Section 4*.

CESA has no comments to offer on this topic at this time.

In summary, please provide your organization's position on the *Local Capacity with Availability-Limited resources and Slow Demand Response Draft Final Proposal*. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats and explain your rationale).

¹ CAISO, Local Resource Adequacy with Availability-Limited Resources and Slow Demand Response - Draft Final Proposal, pp. 5-6. <http://www.caiso.com/Documents/DraftFinalProposal-LocalResourceAdequacy-AvailabilityLimitedResources-SlowDemandResponse.pdf>

² CAISO, Local Resource Adequacy with Availability-Limited Resources and Slow Demand Response - Draft Final Proposal, pp. 6-7. <http://www.caiso.com/Documents/DraftFinalProposal-LocalResourceAdequacy-AvailabilityLimitedResources-SlowDemandResponse.pdf>

³ See "Comments by CESA on RA Enhancements Straw Proposal – Part 1", Feb 5, 2019. <http://www.caiso.com/Documents/CESAComments-ResourceAdequacyEnhancements-StrawProposalPart1.pdf>