California ISO

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
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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?

   NCPA concurs with the CAISO approach.

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?

   NCPA is in general agreement with CAISO's approach to the 2025 Implementation Year as part of a broader Resource Adequacy Enhancements initiative. NCPA is especially appreciative of CAISO's recognition that not all CAISO LSEs are CPUC-jurisdictional, and that any potentially significant changes to the Resource Adequacy program embodied in the CAISO Tariff will affect all LSEs in the CAISO and will require the participation and buy-in of the non-CPUC-jurisdictional LSEs.

   NCPA further supports CAISO's view that a deliberative approach to RA reform is the best policy, and that any material changes to the Resource Adequacy program embodied in the CAISO Tariff will need to be coordinated with the evolving DAME and EDAM market initiatives. NCPA looks forward to participating in this process.

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?

   NCPA has not identified any such risks at this time.

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?

   NCPA has no comment at this time.

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

   NCPA has no comment at this time.

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?

   The LRAs for each of NCPA's members have all adopted Resource Adequacy programs that meet or exceed the existing default criteria in the current CAISO Tariff. NCPA believes that these programs have functioned well. NCPA, and its members, are also following with great interest the California Energy Commission proceeding[1] charged with reviewing and possibly revising the Planning Reserve Margin recommendations for California LSEs. To the extent that the outcome of that proceeding requires a change in the PRM, NCPA anticipates that its member LRAs would fully consider any recommended or required adjustments. NCPA is not currently aware of whether any of its member LRAs are contemplating a slice-of-day approach. NCPA expects that member RA programs will evolve to incorporate all applicable requirements. NCPA will therefore be involved in the proposed Resource Adequacy Enhancements stakeholder process, to ensure that any proposed tariff changes meet its members' needs.

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

   NCPA has no additional comments at this time.

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[1] AB 209 - Public Resources Code (PRC) Section 25704.5