

CAISO Generation Deliverability Study Dispatch Assumptions: Stakeholder Comments

Submitted by	Company	Date Submitted
Renae Steichen (RSteichen@revrenewables.com)	REV Renewables	6/20/2022

REV Renewables (REV) requests that CAISO provide more detailed justification on its use of the proposed 80% maximum storage capability in the near-term deliverability studies and 50% in the mid- and longer-term studies for SSN hours. In particular, when CAISO says it only sees 70% to 90% of storage dispatched for SSN hours in near-term, does that mean while storage may be available at 100%, the CAISO market isn't fully dispatching storage in discharge mode because the market may be sending charge awards to the remaining capacity so that it could be dispatched in HSN hours to meet reliability? In addition, further explanation on the implications of this proposed use would be helpful. For instance, if the storage gets dispatched down to 80% and 50% in the near- and long-term respectively, what generation technology does CAISO plan to dispatch up to make up for loss of storage?

REV also requests that CAISO clarify that the proposed storage SSN deliverability study numbers (80 or 50% of installed capacity) should not be conflated with Qualifying Capacity or ELCC values. It will be helpful to clarify that CAISO deliverability studies are merely attempting to mimic expected discharge of storage for the hours of concern and in most instances, storage can be dispatched up to 100% installed capacity based on the real time system needs.