



Comments on Phase 1 Draft Tariff Language

Initiative: Resource adequacy enhancements

Comment period

Mar 05, 2021, 08:00 am - Mar 17, 2021, 05:00 pm

Submitting organizations

California Energy Storage Alliance

California Energy Storage Alliance

Submitted on 03/17/2021, 11:54 pm

1. Provide a summary of your organization's comments on the phase 1 draft tariff language:

CESA appreciates the opportunity to provide feedback on the CAISO's Draft tariff language relative to Phase 1 of the Resource Adequacy (RA) Enhancements initiative. As noted in comments previously filed under this initiative, CESA is generally supportive of the proposals encompassed by Phase 1. In particular, CESA supports the modifications ISO staff have made regarding the minimum state-of-charge (MSOC) proposal, as they minimize the material and financial impacts of said proposal.

In these comments, CESA requests the ISO to amend the Draft Tariff language relative to the MSOC requirement. Specifically, CESA notes the need to include a section that states the ISO will track and report on the use of MSOC when it is triggered. To this end, CESA recommends adding a section (40.5.3) which will detail the tracking responsibilities of the ISO and the usage of that data in a manner consistent with exceptional dispatch (ED).

2. Provide your organization's comments on tariff amendments relating to the new substitution obligation for maintenance outages (sections 9.3.1.3.1 through 9.3.1.3.5):

CESA offers no comments at this time.

3. Provide your organization's comments on tariff amendments relating to the substitution process transition period covering June 2021 and July 2021 (section 9.3.1.3.9 and Appendix J, part 2):

CESA offers no comments at this time.

4. Provide your organization's comments on tariff amendments conforming existing tariff provisions on RAAIM to the new planned outage substitution process (section 40.9.3.6 and section 40.9.4):

CESA offers no comments at this time.

5. Provide your organization's comments on tariff amendments relating to requiring a new outage request when an existing outage is extended (section 9.3.3):

CESA offers no comments at this time.

6. Provide your organization's comments on tariff amendments relating to new local capacity technical study criteria and related capacity procurement mechanism authority (section 40.3.1.1 and section 43A.2.2):

CESA offers no comments at this time.

7. Provide your organization's comments on tariff amendments relating to the new minimum state of charge tool (section 40.5):

In the RA Enhancements Phase 1 Final Proposal, the ISO introduced a series of modifications to the MSOC proposal including a clear trigger condition, a provision to minimize the number of intervals affected by this requirement, and a sunset provision. Furthermore, the Final Proposal notes the ISO will report on how frequently the minimum state of charge is used, when it was triggered, and may report on the estimated impact that the requirement has on the storage resources on the system.^[1] CESA expressed support for these modifications and considers the Draft Tariff language should reflect them as well.

The current Draft Tariff language does not include a consideration of the aforementioned reporting requirements the ISO highlighted in the Final Proposal. To amend this omission, CESA recommends including a section detailing reporting requirements on MSOC use in a manner consistent with ED, as recorded in Section 34.11.4. As such, CESA proposes the following changes to the Draft Tariff language:

40.5.1 Operation of the MSOC Tool

For the first two years following the effective date of this Section 40.5, on any Trading Day that meets the requirements specified in Section 40.5.2, the CAISO enforces the MSOC Tool in the RTM on Non-Generator Resources that are RA Resources on that day. The MSOC Tool limits RTM awards to a Non-Generator Resource providing RA Capacity such that, based on its registered operating parameters, the Non-Generator Resource will have sufficient charge to meet its discharge awards from its Day-Ahead Schedule.

When reviewing market and system conditions on the Operating Day, the CAISO may

choose not to apply the MSOC Tool for particular Trading Hours if its assessment of projected conditions reflects that the MSOC Tool is not necessary for system reliability in those Trading Hours.

The CAISO will monitor the application of the MSOC Tool in order to report on how frequently it is used, the conditions that lead to its trigger, and the estimated impact that the requirement has on the storage resources on the system in line with the requirements specified in Section 40.5.3.

40.5.2 Determining an MSOC Event Day

The CAISO enforces the MSOC Tool for a Trading Day if there is at least one Trading Hour on that Trading Day for which, per Section 31.5.5, the RUC process initially cannot find a feasible solution without adjusting the constraints described in Section 31.5.4. The CAISO notifies Market Participants in advance of applying the MSOC Tool.

40.5.3 [Not Used] Reporting MSOC Usage

On the fifteenth day of each month, the CAISO shall file with the Commission and post to the CAISO Website an initial report concerning the use of the MSOC tool over the two months prior to the month in which the report is filed. The report shall identify the frequency, volume, costs, and causes behind MSOC use during such period to the extent such data are available. On the thirtieth day of the month following the month in which the initial report is filed, the CAISO shall file with the Commission and post to the CAISO Website a revised and updated report for the same period.

[\[1\]](#) Final Proposal, at 25.

8. Additional comments on the Resource Adequacy Enhancements Phase 1 draft tariff language:

CESA offers no comments at this time.