

1. Please provide a summary of your organization’s comments on Aggregate Capability Constraint (ACC) proposal:

CalCCA appreciates the opportunity to submit comments and supports the CAISO’s proposal to allow multiple aggregate capability constraints (ACCs) at a single generating facility with co-located resources.

2. Provide your organization’s comments on the ACC final proposal:

CalCCA supports the proposed enhancements to allow multiple aggregate capability constraints (ACCs) at a single generating facility with co-located resources through the “master” ACC that prevents dispatch above the point of interconnection limit and “sub” ACCs that model contractual limits when there are multiple off-takers for a co-located resource. Given the investment tax credit (ITC) incentivizes the pairing of new storage at existing solar sites, it is likely sub-ACCs will be highly utilized to model separate contracts with new and existing resources at the same generating facility.

CalCCA understands sub-ACCs will have lower priority than the power-balance constraint, and higher priority than economic bids.¹ As such, ACCs may be relaxed when the market struggles to meet supply and demand. This is a reasonable outcome when additional MWs are needed and available to maintain reliability. However, CalCCA requests the CAISO provide additional detail as to specifically how and when sub-ACCs will be relaxed, and how and when relaxation of those constraints will be communicated to market participants.

3. Provide your organization’s comments on the ACC revised draft tariff language:

CalCCA has no comments on the revised draft tariff language at this time.

4. Provide any additional comments. You may upload attachments using the “attachments” field below:

CalCCA has no additional comments at this time.

¹ Final Proposal at 9.