



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Reforms and Refinements, and Establish Forward Resource Adequacy Procurement Obligations.

R.21-10-002

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S REPLY COMMENTS
ON ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENTS ON
THE FUTURE OF RESOURCE ADEQUACY WORKING GROUP REPORT**

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SUMMARY OF RECOMMENDATIONS

- The Commission should implement a slice-of-day (SOD) framework for the 2025 compliance year at the earliest, given party comments that demonstrate significant additional work is required;
 - The current requirements and penalty structure should apply during a test year;
 - Parties overstate the complexity of hourly obligation and resource trading; these enhancements should be made to the 24-hour slice proposal such that they are in place for the first compliance year;
 - While the storage charging requirement may need to be further evaluated for long-duration storage in the long term, charging requirements should be in place for all storage resources at this time;
 - If the 24-hour slice proposal is not adopted, the Commission must address how to account for energy sufficiency;
 - CalAdvocates' arguments in favor of hedging requirements are cost-based rather than reliability-based, do not acknowledge hedging practices already in place, and should not be adopted;
 - The Commission should coordinate with the CAISO to adopt a UCAP framework, as parties' concerns that UCAP will not achieve the desired maintenance incentives are misguided;
 - Multi-year system and flexible RA requirements should be considered in a subsequent proceeding when the full impacts of such change can be examined; and
 - The Commission should not adopt CalAdvocates proposed change to the PRM.
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I. INTRODUCTION

The California Community Choice Association¹ (CalCCA) submits these Reply Comments pursuant to the schedule set forth in the *Administrative Law Judge’s Ruling Seeking Comments on the Future of Resource Adequacy Working Group Report and the Local Capacity Requirement Working Group Report*² (Ruling), issued on March 4, 2022.

In summary, CalCCA offers the following recommendations in response to parties’

Opening Comments:

- The Commission should implement a slice-of-day (SOD) framework for the 2025 compliance year at the earliest, given party comments that demonstrate significant additional work is required;

¹ California Community Choice Association represents the interests of 23 community choice electricity providers in California: Apple Valley Choice Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert Community Energy, East Bay Community Energy, Lancaster Choice Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

² *Administrative Law Judge’s Ruling Seeking Comments on the Future of Resource Adequacy Working Group Report and the Local Capacity Requirement Working Group Report*, R.21-10-002 (Mar. 4, 2022).

- The current requirements and penalty structure should apply during a test year;
- Parties overstate the complexity of hourly obligation and resource trading; these enhancements should be made to the 24-hour slice proposal such that they are in place for the first compliance year;
- While the storage charging requirement may need to be further evaluated for long-duration storage in the long term, charging requirements should be in place for all storage resources at this time;
- If the 24-hour slice proposal is not adopted, the California Public Utilities Commission (Commission) must address how to account for energy sufficiency;
- The Public Advocates Office's (CalAdvocates') arguments in favor of hedging requirements are cost-based rather than reliability-based, do not acknowledge hedging practices already in place, and should not be adopted;
- The Commission should coordinate with the California Independent System Operator Corporation (CAISO) to adopt an unforced capacity (UCAP) framework, as parties' concerns that UCAP will not achieve the desired maintenance incentives are misguided;
- Multi-year system and flexible Resource Adequacy (RA) requirements should be considered in a subsequent proceeding when the full impacts of such change can be examined; and
- The Commission should not adopt CalAdvocates proposed change to the Planning Reserve Margin (PRM).

II. THE COMMISSION SHOULD IMPLEMENT A SOD FRAMEWORK FOR THE 2025 COMPLIANCE YEAR AT THE EARLIEST, GIVEN PARTY COMMENTS THAT DEMONSTRATE SIGNIFICANT ADDITIONAL WORK IS REQUIRED

In Opening Comments, parties provided a substantial list of open issues that need to be developed and milestones that need to be reached in order to implement a SOD framework. These include, among others, enhancing the transactability of the 24-hour slice proposal by allowing hourly obligation and resource trading, finalizing hourly profiles for wind and solar counting, vetting a new loss of load expectation (LOLE) study and resulting PRM, and modifying the CAISO tariffs and systems to align with the new framework. CalCCA agrees that there are a number of issues that need to be worked out prior to the Commission making a final

decision. The Commission should allow the time necessary to fully consider and develop these open issues to ensure a reliable, cost-effective, and transactable SOD framework is implemented.

Notably, the CAISO indicates in its comments that it will be difficult for it to conduct an initiative implementable by RA-year 2024. The CAISO further describes four topics it would need to consider within an initiative to align its processes with a SOD framework, including:

1. Whether the CAISO should implement a program where both capacity and energy are considered, but interaction with the CAISO is simplified;
2. Processes for the CAISO to evaluate the energy sufficiency to meet demand and battery charging needs;
3. Structure and data needed to validate capacity and energy showings; and
4. Potential changes to CAISO processes and rules such as outage and substitution requirements and backstop cost allocation.³

The CAISO is a critical partner with the Commission in operating California's RA program. Without the ability of the CAISO to implement a compatible framework, the benefits of a SOD framework at the Commission will be diminished. The Commission should allow the necessary time for the CAISO to run its stakeholder process to support the coordinated development of SOD reform with CAISO rule changes.

For these reasons, the Commission should not adopt a SOD framework any earlier than compliance year 2025 to allow the Commission, the CAISO, and parties time to work out open issues and to allow the CAISO time to conduct its stakeholder process. The Commission could issue a decision in Summer 2022 directing parties on which SOD proposal to move forward with (24-hour slice or two-slice), but this decision should not direct implementation any sooner than for compliance year 2025.

³ *Opening Comments on the Future of Resource Adequacy Working Group Report of the California Independent System Operator Corporation*, R.21-10-002 (Mar. 24, 2022) (CAISO Comments), at 6-7.

III. THE CURRENT REQUIREMENTS AND PENALTY STRUCTURE SHOULD APPLY DURING A TEST YEAR

Several parties suggest the Commission adopt a test year before fully implementing the 24-hour slice framework. During the test year, load-serving entities (LSEs) would submit non-binding hourly showings to allow the Commission and LSEs to test and evaluate how the showings and validation process works prior to the first compliance year. A test year would be beneficial in that it would allow the Commission and LSEs to work out any issues identified related to showings and validation before the first compliance year. It would also allow additional time for the Commission and parties to work out the many other open issues identified with enough time for planning and procurement to take place before the first compliance year. A 2024 test year and 2025 compliance year would balance the significant work that needs to be accomplished before the framework is ready for implementation and the urgent need for RA reform.

Pacific Gas and Electric Company (PG&E) and the Natural Resources Defense Council (NRDC) suggest that if the Commission uses a test year, the Commission could assess compliance on both the gross and net peak hours during the test year or during a year of “partial implementation.”⁴ The Commission should not adopt this recommendation. A test year should be just that: a year to test and evaluate the structure as contemplated and adjust if necessary. This test should not change the RA rules otherwise in place, which at present are a system peak load test with maximum cumulative capacity (MCC) buckets to help ensure that resources are available to meet all other hours. The Commission must continue to apply the current rules and requirements and must not institute a net load peak measure. Doing so would effectively

⁴ *Comments of Pacific Gas and Electric Company (U 39 E) on the RA Reform Working Group Report*, R.21-10-002 (Mar. 24, 2022) (PG&E Comments), at 1; and *Comments of the Natural Resources Defense Council on the Future of Resource Adequacy Working Group Report*, R.21-10-002 (Mar. 24, 2022), at 6.

implement, in part, the two-slice proposal for an interim year while knowing that the structure will change yet again the following year. Changing RA requirements in a significant fashion in such short order will make contracting for RA resources difficult. For these reasons, the Commission should use a test year to evaluate while continuing with current RA rules.

IV. PARTIES OVERSTATE THE COMPLEXITY OF HOURLY OBLIGATION AND RESOURCE TRADING; THESE ENHANCEMENTS SHOULD BE MADE TO THE 24-HOUR SLICE PROPOSAL SUCH THAT THEY ARE IN PLACE FOR THE FIRST COMPLIANCE YEAR

In Opening Comments, CalCCA expressed support for the 24-hour slice framework contingent on hourly trading of obligations and resources.⁵ Hourly transactability is a critical component of a 24-hour slice framework, as it would enable all LSEs to shape their resources and load to meet their obligations without creating artificial market scarcity or necessitating costly over-procurement. Without hourly transactability, the 24-hour slice framework would drive up customer costs and potentially result in the need to hold on to carbon-emitting resources that are not needed if the RA fleet could be used more efficiently through hourly trading. The minor increases in complexity are well worth the benefits of a cost-effective RA program with transactable RA products.

Some parties support considering hourly obligation and resource trading for future adoption after the initial implementation of SOD.⁶ If hourly trading is not allowed beginning with the first SOD compliance year, the Commission risks significant market disruption, increased customer costs, and LSEs being non-compliant despite their best efforts. In addition, there is potential to penalize an individual LSE while the sum of all RA showings meet the total

⁵ *California Community Choice Association's Comments on Administrative Law Judge's Ruling Seeking Comments on the Future of Resource Adequacy Working Group Report*, R.21-10-002 (Mar. 24, 2022), at 4-11.

⁶ California Efficiency + Demand Management Council, California Energy Storage Alliance, Green Power Institute, and Solar Energy Industries Association and the Large-scale Solar Association.

system need when the individual LSE cannot meet an hour or sub-set of hours due to the lack of ability to trade to meet those hourly requirements. In sum, in order to prevent “leaning” the inability to trade will potentially ignore diversity. While the 24-hour slice proposal has the benefit of ensuring all LSEs bring enough capacity to meet their hourly needs without leaning on the system or other LSEs, this cannot be accomplished at the expense of non-investor-owned utility (IOU) LSEs being subject to artificially scarce RA supply while the IOU LSEs being unnecessarily long. Section 380 requires the RA program to “[m]aximize the ability of community choice aggregators (CCAs) to determine the generation resources used to serve their customers.”⁷ Subjecting non-IOU LSEs (CCAs) to procuring artificially scarce RA supply due to the inability to transact to meet their obligations conflicts with a fundamental objective of the RA program. Therefore, the 24-hour slice proposal should be implemented with hourly resource and RA obligation trading beginning with the initial compliance year.

Other parties express concern about the perceived complexity hourly trading would add to the 24-hour slice framework.⁸ These concerns overstate the complexity of hourly obligation and resource trading. Currently, resources can sell portions of its capacity to multiple LSEs (*e.g.*, 70 percent of its capacity to LSE 1 and 30 percent of its capacity to LSE 2). The Commission validates showings to ensure no portions of resources’ capacity are sold to multiple LSEs. This would continue to be allowed under the 24-hour slice proposal. Hourly transactions of resources and obligations can and should also be allowed to ensure LSEs can comply in each hour. The Commission should similarly evaluate hourly transactions to ensure no capacity is double-counted. While this adds some additional complexity for LSEs who would need to transact these

⁷ Public Utilities Code § 380(b)(5).

⁸ California Environmental Justice Alliance (CEJA) and the Union of Concerned Scientists (UCS), and California Large Energy Consumers Association (CLECA).

hourly products, LSEs who would be doing these transactions have indicated that is not only worth the additional complexity, but also a critical component for the 24-hour slice proposal to be workable.

Indeed, moving to hourly is akin to the current RA system. That is, today there are monthly RA requirements. Parties transact individual months and are not restricted to purchasing in time frames longer than the compliance obligation. While parties may purchase multiple months to multiple years, they are not obligated to do so. Rather, an LSE can show a resource for an individual month provided the resource also provides a supply plan. With an hourly requirement, it is not logical to require LSEs to procure more than an individual hour as that is the compliance obligation.

V. WHILE THE STORAGE CHARGING REQUIREMENT MAY NEED TO BE FURTHER EVALUATED FOR LONG-DURATION STORAGE IN THE LONG TERM, CHARGING REQUIREMENTS SHOULD BE IN PLACE FOR ALL STORAGE RESOURCES AT THIS TIME

Form Energy, Inc., requests that if Southern California Edison Company's (SCE's) 24-hour slice proposal is adopted, any storage device capable of output for a duration of 12 hours or more be exempt from the charging sufficiency testing recommended in the SCE proposal.⁹ The use of storage with a discharge period of 12 hours or multiple days is very unique and will likely ultimately require further evaluation of the reliability it can provide including how charge energy is made available and assured to be available in a program like RA. The use of such a device to provide RA reliability, however, should not be exempted from the evaluation of charge energy in the near term. Doing so could result in paper compliance without sufficient energy to discharge the resource to meet reliability needs.

⁹ *Comments of Form Energy, Inc. on the Future of Resource Adequacy Working Group Report*, R.21-10-002 (Mar. 24, 2022), at 3-4.

Longer-term, CalCCA agrees that the resource may not charge during the peak load day in any hour relying instead on charging that occurred days or even weeks prior. Such a complication will ultimately require further evaluation to determine how the RA program should assess the efficacy of such facilities. In the near term, with very few of such resources interconnected or in the development stages, it is not appropriate to provide a waiver that could compromise the RA program while a longer-term evaluation is being performed and modifications made to the RA program to account for the unique characteristics of this type of resource.

VI. IF THE 24-HOUR SLICE PROPOSAL IS NOT ADOPTED, THE COMMISSION MUST ADDRESS HOW TO ACCOUNT FOR ENERGY SUFFICIENCY

Parties take varying positions on the use or retirement of MCC buckets. CEJA and UCS claim that under either model, the MCC buckets should be retired.¹⁰ CalAdvocates, on the other hand, recommends retaining MCC buckets regardless of which model the Commission chooses.¹¹ The CAISO appears to take a middle ground, dependent upon circumstances, noting that the actual RA fleet made available in any month may differ from the fleet used to create Effective Load Carrying Capacity (ELCC) values. Therefore, the CAISO suggests that the availability of energy from the RA fleet may not be assured. This may necessitate the use of MCC buckets so as not to over-rely on use-limited resources under Gridwell Consulting's (Gridwell) two-slice proposal. CalCCA agrees with the CAISO with regard to the Gridwell two-slice proposal in that the potential differences between the RA pool available in any month and the resources used to develop ELCC may not provide enough confidence that the system will be energy sufficient in all hours without the use of MCC buckets.

¹⁰ *California Environmental Justice Alliance and Union of Concerned Scientists Opening Comments on the Future of Resource Adequacy Working Group Report*, R.21-10-002 (Mar. 24, 2022), at 11-12.

¹¹ *Comments of the Public Advocates Office on the Future of Resource Adequacy Working Group Report*, R.21-10-002 (Mar. 24, 2022) (CalAdvocates Comments), at 16-17.

With regard to SCE's 24-hour slice proposal, where use limitations are accounted for in the resource counting rules (*i.e.*, limiting how many hours in a day the resource can be counted upon), limitations on days of availability need to be addressed. For demand response, this is accomplished through a standard in which demand response resources must be available for four consecutive hours over three consecutive days.¹² Given that peak loads do not happen in every day of the month, a system allowing for certain resources to not be available on every day is a reasonable outcome. Determining the minimum number of days a resource must be available should be evaluated under the LOLE study to ensure that the appropriate level of reliability from such resources is being provided and a maximum amount of resources that an LSE could claim that are available for the minimum number of days is appropriate. In short, the Gridwell model will likely continue to require an MCC bucket methodology while the SCE proposal does not. Both models would likely require a limitation on the number of resources that are not available for the hours shown for every day of the month.

VII. CALADVOCATES' ARGUMENTS IN FAVOR OF HEDGING REQUIREMENTS ARE COST-BASED RATHER THAN RELIABILITY-BASED, DO NOT ACKNOWLEDGE HEDGING PRACTICES ALREADY IN PLACE, AND SHOULD NOT BE ADOPTED

CalAdvocates supports the implementation of a mandatory hedging program through the RA mechanism. While CalAdvocates states:

“There is the potential for numerous ratepayer and LSE operational benefits associated with hedging tools like the hedging proposals in the Slice of Day Report and the use of tolling agreements; tools that can be developed and applied through the RA program,”¹³

¹² Decision (D.) 11-06-022, *Decision Adopting Local Procurement Obligations for 2012 and Further Reining the Resource Adequacy Program*, R.09-10-032 (June 23, 2011).

¹³ CalAdvocates Comments at 10.

none of the six plus pages CalAdvocates dedicates to the topic describe the “operational benefits” with regard to increased grid reliability from resource adequacy. The entire description is based on the false premise that LSEs are insufficiently hedged based upon 1) a decrease in the amount of tolling agreements; and 2) a report that the Energy Division staff provided indicated the CCAs and Electric Service Providers (ESPs) were less forward contracted than IOUs. While noting that “the data are not informed by any non-commodity hedge information”, CalAdvocates concludes that CCAs and ESPs are “particularly exposed to price spikes on the CAISO energy market.”¹⁴

The RA program is and should be about providing a reliable set of resources to meet grid reliability needs. When the Commission identified an issue with imports that would allow capacity to likely not be struck due to bidding at the cap, the Commission put in place new rules to address it.¹⁵ This proceeding has not identified a similar situation from resources interconnected to the CAISO grid. This is because such resources are not able to sell the energy coming from their capacity off grid without offering it into the CAISO market at a price that it will clear. The exact opposite was true for RA imports. Thus, the only threat to reliability with in-state resources is for an RA resource to exercise market power through financial withholding (*i.e.*, bidding the resource excessively high to avoid market-clearing making the market clear on higher-priced resources). This fails to recognize that the CAISO does have market power mitigation in place for all local area resources and has a stakeholder process in progress to evaluate system market power mitigation. In addition, post-2000 California energy crisis, the Federal Energy Regulatory Commission (FERC) has made clear that such withholding is in

¹⁴ *Id.* at 10.

¹⁵ D.20-06-028, *Decision Adopting Resource Adequacy Import Requirements*, R.17-09-020 (June 25, 2020).

violation of FERC regulation with significant penalties to those found to have used such schemes.

Thus, other than concerns over costs to customers, the current proceeding and CalAdvocates have not advanced the reliability argument necessary to conclude that the RA program should be amended to include a market power mitigation tool. While many parties are concerned about customer costs, those concerns extend not only to CalAdvocates and the Commission but to every LSE that serves customers in California. The responsibility for the efficacy of hedges put in place to protect customers from market price volatility is not that of the Commission for every LSE even if those LSEs do have to comply with the Commission for RA reliability.

Since the proceeding has not identified a reliability threat not already addressed by other regulations including those administered by other authorities, the implementation of a market power mitigation process in the RA construct serves to regulate the financial activities of market participants outside of the jurisdiction of this Commission and should therefore be rejected.

VIII. THE COMMISSION SHOULD COORDINATE WITH THE CAISO TO ADOPT A UCAP FRAMEWORK, AS PARTIES' CONCERNS THAT UCAP WILL NOT ACHIEVE THE DESIRED MAINTENANCE INCENTIVES ARE MISGUIDED

Several parties express support for the adoption of a "UCAP-light" for thermal resource counting, meaning a thermal resource's qualifying capacity (QC) would be derated to account for thermal derates only, and not other types of forced outage.¹⁶ CLECA expresses concern that because forced outage rates are reliant on historical performance, expanding UCAP beyond ambient derates to include other types of forced outages may discourage investments that would improve resource performance given that improved performance would take years to be reflected

¹⁶ CLECA, the Independent Energy Producers Association, and Shell Energy North America (US), L.P. d/b/a Shell Energy Solutions.

in the QC.¹⁷ However, UCAP should incentivize resource maintenance better than the structure currently in place that relies on the Resource Adequacy Availability Incentive Mechanism (RAAIM) and substitution requirements. The CAISO has presented data in its RA Enhancements initiative that suggests the current structure does not result in substitutions to cover forced outages, indicating incentives to perform maintenance do not currently exist.¹⁸

UCAP, on the other hand, would directly utilize unit-specific past performance, the best predictor of future performance, to inform the reliability contribution of the unit for the purposes of resources adequacy. This should incentivize resources to perform maintenance and improve their reliability in the first instance to avoid forced outages and maintain a high UCAP value. Most other resources on the system are valued based on historical performance in some manner (e.g., exceedance for hydro, ELCC for wind and solar) so it is unclear why parties suggest using historical information for thermal resources is inappropriate. Resources with demonstrated reliability improvements would see such results reflected in their capacity value fully within three years. To ensure maintenance that improves the reliability of a resource is more quickly reflected the net qualifying capacity, the Commission could adopt a weighting mechanism as proposed by the CAISO to weight more recent outages more heavily.¹⁹ This would strengthen the incentives to perform planned maintenance that are already inherent within a UCAP methodology because maintenance that results in improved reliability of the plant would be reflected in the plant's RA value sooner.

¹⁷ *California Large Energy Consumers Association Comments on Administrative Law Judge's Ruling Seeking Comments on the Future of Resource Adequacy Working Group Report and the Local Capacity Requirement Working Group Report*, R.21-10-002 (Mar. 24, 2022), at 6-7.

¹⁸ *Resource Adequacy Enhancements Fifth Revised Straw Proposal*, July 7, 2020, at 98-100: <http://www.caiso.com/InitiativeDocuments/FifthRevisedStrawProposal-ResourceAdequacyEnhancements.pdf>

¹⁹ Final Report at 56.

For these reasons, the Commission and the CAISO should work together to adopt a UCAP framework in a coordinated manner that would improve the incentives for resources to be available and perform planned maintenance.

IX. MULTI-YEAR SYSTEM AND FLEXIBLE RA REQUIREMENTS SHOULD BE CONSIDERED IN A SUBSEQUENT PROCEEDING WHEN THE FULL IMPACTS OF SUCH CHANGE CAN BE EXAMINED

Few parties support moving to a multi-year forward system and/or flexible RA requirement at this time. CalCCA sees two important reasons not to pursue such a mechanism at this time. First, the interaction of the Central Procurement Entity (CPE) and its impact on LSE procurement would need to be evaluated. This is particularly problematic since in 2021 procurement for 2023 delivery, PG&E as the CPE had a significant short-fall in meeting the local area needs and SCE also experienced a more minor short-fall. Since all non-self-shown resources are paid by the CPE, the costs and benefits are allocated via cost allocation mechanism to all LSEs in the CPE Transmission Access Charge (TAC) Area. The current insufficient procurement by the CPEs has caused difficulty for all LSEs in completing their own system and flexible procurement for 2023. This difficulty is only somewhat mitigated by the fact that there are still seven months total before the year-ahead showing for 2023. Even with this amount of time, the LSEs are left with little time to know of their allocation and perform final procurement. If the system and flexible RA requirements are moved to a multi-year forward process the time between CPE procurement and potential CPE deficiency, prior to LSE procurement will make such a process very uncertain and potentially expensive for customers. In order to address this, the Commission needs to evaluate the efficacy of the CPE process and in doing so, would need to evaluate the necessary timing to make a CPE and LSE procurement for multiple years forward work seamlessly and effectively for the CPEs and LSEs alike.

In addition, the proceeding has yet to evaluate the interaction of load migration and the minimum requirements for a multi-year forward requirement. Given that this could be particularly difficult with no clear guidance on which structural RA reform model the Commission will choose and how transactability will be resolved, moving to a multi-year forward requirement with load uncertainty, resource counting uncertainty, and basic RA structure uncertainty seems to be an ill-advised action.

For these reasons, the Commission should not adopt a multi-year forward system and/or flexible RA requirement at this time.

X. THE COMMISSION SHOULD NOT ADOPT CALADVOCATES PROPOSED CHANGE TO THE PRM

CalAdvocates recommends the CEC develop an hourly 1-in-5 weather year forecast as part of its efforts to support the Slice-of-Day framework.²⁰ This recommendation builds on CalAdvocates' comments to the Energy Division's Loss of Load Expectation Study (Study) in which CalAdvocates recommend a 13 percent PRM be applied to a 1-in-5 forecast to set RA requirements. CalCCA reiterates its position in reply comments to the Study that the Commission should not adopt a new level of forecast and resulting PRM in favor of a PRM based on robust LOLE analysis.²¹ LOLE studies are critical to inform the amount of resources that need to be procured as RA in order to meet a targeted level of reliability under any SOD framework adopted. The Commission should therefore perform a robust stakeholder process to ensure the assumptions of the LOLE study are reasonable and reflect the counting methodologies ultimately adopted under the new framework.

²⁰ CalAdvocates Comments at 18.

²¹ *California Community Choice Association's Reply Comments on the Local Capacity Requirement (LCR) Final Working Group Report and Energy Division's Loss of Load Expectation Study*, R.21-10-002 (Mar. 22, 2022), at 4.

XI. CONCLUSION

For all the foregoing reasons, CalCCA respectfully requests consideration of the comments specified herein and looks forward to an ongoing dialogue with the Commission and stakeholders.

Respectfully submitted,

A handwritten signature in blue ink that reads "Evelyn Kahl".

Evelyn Kahl
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CALIFORNIA COMMUNITY CHOICE
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April 1, 2022