

California Community Choice Association

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Contact

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1. Please provide your organization's comments on the Draft 2023 Flexible Capacity Needs Assessment and Availability Assessment Hours April 14 stakeholder call discussion:

California Community Choice Association (CalCCA) appreciates the opportunity to comment on the Draft 2023 Flexible Capacity Needs Assessment and Availability Assessment Hours stakeholder call. The results of the Draft 2023 Flexible Capacity Needs Assessment (Draft Assessment) show a significant increase in the flexible capacity requirements for 2023 compared to the 2022 requirements. It is expected that as new variable energy resources come onto the system, the need for flexible capacity will increase. To better understand the drivers of the increase for 2023 the California Independent System Operator Corporation (CAISO) should provide additional information to allow stakeholders to assess the magnitude of the increase for 2023.

The summary of expected capacity from variable energy resources (VERs) on slide 11 shows an expected increase of roughly 3,000 Net-Dependable Capacity^[1] megawatts (MW) of in-front of the meter VERs and an increase of roughly 1,000 MWs of behind-the-meter solar from 2022 to 2023. The increase in flexible requirements between 2022 and 2023 (at most 4,892 MW) is larger than the amount of new VERs expected to come online between 2022 and 2023 (roughly 4,000 MW total).

Total CPUC Jurisdictional Flexible Capacity Requirements (MW)			
Month	Actual-2022	Draft-2023	Delta
Jan	18,532	20,488	1,956
Feb	18,742	22,696	3,954
Mar	18,694	23,313	4,619
Apr	18,853	22,879	4,026
May	19,378	21,433	2,055
Jun	16,552	20,177	3,625
Jul	15,924	17,971	2,047
Aug	16,198	19,318	3,120
Sep	16,453	21,346	4,893
Oct	18,912	23,238	4,326
Nov	18,740	23,449	4,709
Dec	19,321	21,168	1,847

Because this delta could be explained by differences in what was expected and what actually came online, CalCCA also evaluated the difference in the Total Internal and

Dynamically Scheduled VERs in the Flexible Capacity Needs Assessment for the 2022 Assessment and the 2023 Draft Assessment. The expected 2022 MW in last year's study was 20,049 MW^[2] and the expected 2023 MW used in this year's study is 22,672 MW^[3]; a difference of only 2,623 MW. It is not clear how this change in VER capacity results in a more than one-for-one increase in the flexible capacity requirement.

The Draft Assessment indicates, "Other factors that have contributed to an increase in the 2023 three-hour ramp forecast include an increase in the peak and ramp CEC forecast, additional co-located and traditional VERs in survey submittals, as well as weather and curtailment variability."^[4] The CAISO should provide more information explaining how each of these factors contributes to the resulting requirements and should provide the Net Load Data set as it has in previous years to allow stakeholders to evaluate the study and resulting 2023 requirements.

[1] Pmax; as defined in the BPM for Definitions and Acronyms.

[2] Flexible Capacity Needs and Availability Assessment Hours Technical Study for 2022 Presentation at Slide 12: <http://www.caiso.com/InitiativeDocuments/Presentation-2022FlexibleCapacityNeedsAssessment-Apr222021.pdf>.

[3] Draft 2023 Flexible Capacity Needs and Availability Assessment Hours Technical Study at Slide 11: <http://www.caiso.com/InitiativeDocuments/Presentation-2023FlexibilityCapacityNeedsAssessment-Apr142022.pdf>.

[4] Draft 2023 Flexible Capacity Needs Assessment at 11: <http://www.caiso.com/InitiativeDocuments/Draft2023FlexibleCapacityNeedsAssessment.pdf>.