

California Community Choice Association

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Contact

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1. Please provide a summary of your organization's comments on the capacity procurement mechanism (CPM) enhancements track 1 straw proposal:

The California Community Choice Association (CalCCA) appreciates the opportunity to comment on the California Independent System Operator Corporation's (CAISO's) CPM enhancements track 1 straw proposal. These comments focus on proposals 4.1 and 4.2, which would modify the CAISO's Capacity Procurement Mechanism (CPM) authority to:

1. Allow the CAISO to reduce megawatts (MW) of a significant event CPM award in the event a resource receives another commitment to the CAISO; and
2. Allow the CAISO to reduce the term of a significant event CPM in the event the CPM capacity has another commitment later in the month that is not visible to the CAISO.

In summary, CalCCA supports both of these changes, as they will allow the CAISO to more efficiently access CPM capacity needed to maintain system reliability.

2. Provide your organization's comments on section 4.1: reducing the volume (MW) of significant event CPM designations when the designated capacity is committed and visible to the ISO:

The CAISO proposes to have the authority to reduce the volume (in MW) of significant event CPM designations when the designated capacity is otherwise committed to the CAISO (e.g., through a Resource Adequacy (RA) contract, Reliability Must-Run (RMR) designation, or monthly CPM designation). The CAISO already has this flexibility for exceptional dispatch CPMs and this proposal would extend this flexibility to significant event CPMs. CalCCA supports this change. Allowing the CAISO to shape the MW amount of the designation to the uncontracted capacity both before and after the generator accepts the CPM award will allow the CAISO to most efficiently designate CPM capacity to meet the reliability need triggering the significant event.

3. Provide your organization's comments on section 4.2: reducing the term of significant event CPM designations when the designated capacity is already committed but not visible to the ISO:

The CAISO proposes to have the authority to reduce the term of significant event CPM designations when the designated capacity is already committed but not visible to the CAISO (e.g., capacity contracted to an entity outside the CAISO balancing authority area). Under this proposal, the CAISO would continue to offer CPM designations to generators for 30-day terms, but generators would be able to voluntarily accept significant events for less than 30 days when the designated capacity has already been

committed for the upcoming month. This authority does not already exist for any CPM type, and the CAISO proposes to extend it for only the significant event CPM.

CalCCA supports this proposal as it could unlock uncommitted capacity that is currently inaccessible to the CAISO due to the length of the CPM term and, in turn, could lower CPM costs if lower-cost resources unavailable for a 30-day term are available for the shorter term. To further extend the benefits of this proposal, the CAISO should extend this proposal to exceptional dispatch CPMs.

4. Provide your organization's comments on section 4.3: CPM reporting via OASIS:

CalCCA has no comments on this topic at this time.

5. Provide your organization's comments on section 4.4: CPM market notices:

CalCCA has no comments on this topic at this time.

6. Provide your organization's comments on section 4.5: CPM notifications to scheduling coordinators:

CalCCA has no comments on this topic at this time.

7. Please provide additional comments on the CPM enhancements track 1 straw proposal not mentioned above:

CalCCA has no additional comments at this time.