

California Community Choice Association

SUBMITTED 09/09/2022, 03:05 PM

Contact

Shawn-Dai Linderman (shawndai@cal-cca.org)

1. Please provide a summary of your organization's comments on the Draft Final Proposal.

SUPPORT WITH CAVEATS

The California Community Choice Association (CalCCA) appreciates the opportunity to comment on the California Independent System Operator Corporation's (CAISO's) Energy Storage Enhancements Draft Final Proposal.

CalCCA continues to support the CAISO's co-located enhancements that would provide co-located storage resources with optional functionality in the day-ahead and real-time markets to ensure storage charging schedules do not exceed onsite renewable generation. This proposal will enable co-located storage resources to more effectively manage storage charging in a way that aligns with investment tax credit regulations. To improve this proposal, the CAISO should allow co-located resources to flag the ability to schedule charging up to its day-ahead forecast of renewable output, as opposed to the current proposal that would not schedule day-ahead charging or schedule charging only if there is a storage self-schedule. Otherwise, if the operator does not bid the renewable component in day-ahead (as is permitted under the Resource Adequacy (RA) must offer obligation rules), the renewable component would not receive a charging schedule until real-time. Scheduling storage charging subject to the renewable component's day-ahead forecast will reflect the co-located resource's expected ability to charge in the day-ahead timeframe and result in more efficient schedules in the day-ahead and real-time markets. Finally, CalCCA supports the ability for storage operators to toggle this functionality on or off and the removal of language around outage card submission and Resource Adequacy Availability Incentive Mechanism (RAAIM) application for the inability to charge from the grid.

CalCCA also supports the CAISO's proposals to:

- Include opportunity costs in the day-ahead storage default energy bid;
- Improve accounting for state-of-charge of resources providing regulation; and
- Enhance the CAISO's exceptional dispatch tools for storage resources by holding state-of-charge and compensating them for their opportunity costs of being exceptionally dispatched.

2. Please provide comments on the EIM Governing Body classification.

SUPPORT

CalCCA has no additional comments at this time.

3. Please provide any additional input not included above related to the Draft Final Proposal.

CalCCA has no additional comments at this time.