

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 Transmission Service and Market Scheduling Priorities Phase 2 straw proposal and August 11, 2022 stakeholder call discussion:

California Community Choice Association (CalCCA) appreciates this opportunity to provide comments on the Straw Proposal. Of paramount importance to community choice aggregators (CCAs) as load serving entities (LSEs) whose customers pay for transmission on the California Independent System Operator Corporation (CAISO) grid is ensuring that the wheeling through proposals do not negatively impact transmission capacity to meet native load needs even in extremely constrained conditions. Therefore, the CAISO's calculation of existing transmission commitments (ETC) must be accurate, current, and representative of peak load conditions. CalCCA looks forward to its participation in this initiative and provides more detailed comments on the ETC calculation below.

2. Provide your organization's comments on the design principles discussed in section 4:

CalCCA is supportive of the Design Principles set forth in section 4, with two additions. First, the CAISO should not only ensure that it "maintains sufficient transmission capacity to meet native load needs reliably" presently but should consider future needs in terms of likely load growth over and above historical levels based on increased electrification and economic growth. Similarly, CAISO should not only consider historical and present climate conditions but must incorporate into its analysis the likelihood of future increased instances of extreme weather events due to climate change, similar to the heat wave experienced in early September 2022.

3. Provide your organization's overall comments on calculating ATC in the monthly horizon, as described in section 5.1.1. In particular, the different approaches for calculating native load needs as an existing commitment and other components of the ATC methodology as discussed in the proposal. The ISO encourages stakeholders to share potential alternative methods for consideration in calculating components, particularly native load needs.

CalCCA generally agrees with CAISO's "Approach 3" – deriving native load needs based on the "higher of" Approaches 1 and 2, as long as the data used for the calculations represents the most constrained scenario. CalCCA is concerned that viewing historical data (the prior year or further back) will not adequately portray the likely future increased incidence of severe climate events such as the September 2022 heat wave. In addition, with respect to load growth, while the CAISO quotes a one percent per year average load growth figure, future electrification and economic growth will likely fuel increased load growth that must be considered. Given that other proceedings considering procurement needs, including the Integrated Resource Plan (IRP) and Resource Adequacy (RA) proceedings at the California Public Utilities

Commission, are considering both climate and electrification as substantially contributing to load growth over the coming years, the CAISO must also consider these factors in calculating ATC.

In addition, CalCCA supports CAISO similarly taking a “higher of” approach to options 2A, 2B, and 2C to determine the highest native load need.

- 4. Provide your organization’s comments on each of the ISO’s proposed approaches for calculating existing transmission commitments (ETC) as it relates to the ATC methodology as described in section 5.1.1.2. Particularly, the ISO seeks comment on the methods or approaches identified for estimating native load needs across a 13-month horizon and encourages stakeholders to suggest potential variations to inputs in deriving the amount of transmission capacity to set aside for native load needs.**

Please see response to Question 3.

- 5. Provide your organization’s comments on the Transmission Reliability Margin (TRM) and the Capacity Benefit Margin (CBM) as it relates to the ATC methodology, as described in section 5.1.1.3:**

CalCCA has no comment at this time.

- 6. Provide your organization’s overall comments on calculating the ATC in the daily horizon, as described in section 5.1.2:**

CalCCA has no comment at this time.

- 7. Provide your organization’s comments on calculating existing transmission commitments (ETC), particularly native load needs, as it relates to the calculation of daily ATC, as described in section 5.1.2.2:**

Please see response to Question 3.

- 8. Provide your organization’s comments on the Transmission Reliability Margin (TRM) and the Capacity Benefit Margin (CBM) as it relates to daily ATC, as described in section 5.1.2.3:**

CalCCA has no comment at this time.

- 9. Provide your organization’s comments on the method for accessing ATC to establish wheeling through scheduling priority, as described in section 5.1.3. In particular, consider comments on the requirements identified for accessing ATC.**

CalCCA has no comment at this time.

- 10. Provide your organization’s comments on the proposed enhancement to establish a window during which the submitted requests are vying for limited ATC based upon the underlying duration of the supply contract duration of ATC request as described in section 5.1.3:**

CalCCA has no comment at this time.

11. Provide your organization's comments on a wheeling through priority rights holder's ability to resell the wheeling through scheduling priority as described in section 5.1.3:

CalCCA has no comment at this time.

12. Provide your organization's comments on the ISO's proposal to establish a process through which entities seeking to establish wheeling through priority on a long-term basis (longer than 1-year) can do so through submission of a study request and the ability to fund upgrades on the ISO system, including the ability of import (wheel in) requests driving Maximum Import Capability (MIC) upgrades as described in section 5.1.4:

CalCCA has no comment at this time.

13. Provide your organization's comments on compensation for wheeling through scheduling priority, as described in section 5.1.5, along with any suggestions your organization may have regarding other potential ways to assess transmission charges for high priority wheeling through transactions:

CalCCA has no comment at this time.

14. Provide your organization's comments on the proposed WEIM decisional classification, as described in section 6:

CalCCA has no comment at this time.

15. Provide any additional comments on the Transmission Service and Market Scheduling Priorities Phase 2 straw proposal and August 11, 2022 stakeholder call discussion:

CalCCA has no comment at this time.