

California Community Choice Association

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Contact

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1. Please share your organization's overall position on the final proposal:

SUPPORT WITH CAVEATS

Co-Located Resource Enhancements

The California Community Choice Association (CalCCA) supports the proposed enhancements that would provide co-located resources with optional functionality to only charge from the on-site renewable. The California Independent System Operator's (CAISO's) final proposal makes a necessary modification that would allow the market to use renewable forecast data to inform storage charging in the day ahead in the event co-located renewables are not bid into the day-ahead market. Storage resources will likely utilize this functionality less frequently now that the inflation reduction act has passed, and the investment tax credit (ITC) is no longer limited to storage resources with onsite renewables. However, resources with existing contracts signed before the passage of the inflation reduction act will still need this functionality. CalCCA thanks the CAISO for incorporating stakeholder feedback relative to co-located resources and supports this element of the final proposal.

Ancillary Service Reliability Enhancements

The CAISO's final proposal includes two proposals related to storage resources with ancillary service awards. The first would update the state-of-charge equation to recognize the impact of regulation awards using hourly multipliers. CalCCA supports this change, as it would more accurately anticipate how ancillary service awards will affect the resources' available energy. The second would require real-time energy bids to accompany ancillary service awards to ensure day-ahead ancillary service awards over multiple consecutive hours are feasible in the real-time market. CalCCA continues to request, as it has in previous comments,[\[1\]](#) that the CAISO only apply this bidding rule when it is needed given the storage resource's state-of-charge (SOC) at the time of the regulation award.

Exceptional Dispatch Reliability Enhancements

CalCCA supports the CAISO's proposal to enable exceptional dispatches on storage resources to hold SOC and compensate resources for those exceptional dispatches based on their opportunity costs of holding SOC.

Day-Ahead Default Energy Bid

CalCCA supports the CAISO's proposal to update the day-ahead default energy bid to include an opportunity cost adder.

[1] CalCCA Comments on the CAISO's Second Revised Straw Proposal (Aug. 3, 2022): <https://stakeholdercenter.caiso.com/Comments/AllComments/6211a605-5db0-45c7-a959-3b1df57bb7ba#org-08e0efa3-a8e8-4a2c-8bd2-1103f0a11638>

2. Please provide comments on the EIM Governing Body classification

CalCCA has no comments on the EIM Governing Body classification at this time.

3. Please provide any additional input not included above related to the final proposal.

CalCCA has no additional comments at this time.