

# California Community Choice Association

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## Contact

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

- 1. Please provide a summary of your organization's comments on the WEIM Resource Sufficiency Evaluation (RSE) Enhancements Phase 2 revised final proposal and November 7, 2022 stakeholder call discussion:**

The California Community Choice Association (CalCCA) appreciates the opportunity to provide comments on the Revised Final Proposal. CalCCA comments on a specific issue regarding allocation of the costs of the California Independent System Operator Corporation (CAISO) opting in to utilizing energy assistance as part of its participation in the Western Energy Imbalance Market (WEIM). In the event the CAISO has opted in, and subsequently fails the resource sufficiency evaluation (RSE) resulting in the CAISO being charged for assistance energy, the CAISO proposes to sub-allocate the costs or charges of assistance energy to measured demand. Allocating costs in this manner may fail to provide appropriate incentives within the CAISO for load-serving entities (LSEs) to avoid such deficiencies. The CAISO should clarify its proposal for charging LSEs within the CAISO for RSE failures, and provide further justification for its cost allocation proposal.

- 2. Please provide your organization's overall position on the WEIM Resource Sufficiency Evaluation Enhancements Phase 2 revised final proposal:**

**SUPPORT WITH CAVEATS**

Support with caveats

- 3. Provide your organization's comments on the interaction between advisory WEIM transfers and HASP intertie schedules, and the proposal to account for this interaction as described in section 4.2 of the revised final proposal (no changes were made in the revised final proposal):**

CalCCA has no comments at this time.

- 4. Provide your organization's comments on the proposed changes to the tagging of LPT exports, as described in section 4.2.3 of the revised final proposal (no changes were made in the revised final proposal):**

CalCCA has no comments at this time.

- 5. Provide your organization's comments on the proposal to cure resource insufficiencies through the WEIM subject to an out of market financial surcharge, as described in section 5.1 of the revised final proposal:**

CalCCA has no comments at this time.

- 6. Provide your organization's comments on the proposed allocation of assistance energy revenue and charges, as described in section 5.1.1 of the revised final proposal:**

The CAISO should clarify its proposal to sub-allocate the assistance energy charge among LSEs within the CAISO (Revised Proposal, Section 5.1.1 at 27). Specifically, the Revised Final Proposal states that WEIM balancing authority areas (BAA) will charge for assistance energy within their BAA “as defined in their OATT.” With respect to the CAISO BAA, CAISO proposes “to sub-allocate the assistance energy charge to measured demand.” The CAISO’s proposal on sub-allocating the charge appears to ignore the principles of cost causation by failing to only charge the load-serving entity(s) (LSE) that actually caused the RSE failure. The CAISO should explain whether instead of allocating among measured demand, it can allocate this charge or charges among LSEs that caused the RSE failure in order to provide appropriate incentives to LSEs to avoid such deficiencies causing the RSE failure.

**7. Provide your organization’s comments on the proposed WEIM decisional classification, as described in section 6 of the revised final proposal:**

CalCCA has no comments at this time.

**8. Provide any additional comments on the WEIM Resource Sufficiency Evaluation Enhancements Phase 2 revised final proposal or November 7, 2022 stakeholder call discussion:**

CalCCA has no comments at this time.