

# 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 Capacity Procurement Mechanism (CPM) Enhancements Track 2 stakeholder meeting.

The California Community Choice Association (CalCCA) appreciates the opportunity to comment on the California Independent System Operator's (ISO) CPM Enhancements Track 2 Straw Proposal. CalCCA supports the ISO's proposal to increase the CPM soft offer cap from \$6.31 per kilowatt (kW) -month to \$7.34 per kW-month. The ISO's proposal to use updated California Energy Commission-provided combined cycle going-forward fixed costs is consistent with the existing ISO tariff and reflects the fact that most of the recent CPM capacity comes from gas resources.

The ISO's presentation notes that it will consider additional CPM enhancements in a future initiative following a Resource Adequacy (RA) working group that will begin in late 2023. Within this initiative, the ISO should develop how it will perform backstop in the event ISO load-serving entities, collectively or individually, do not procure sufficient capacity to satisfy RA needs in all hours of the day once the California Public Utilities Commission RA program transitions to its slice-of-day framework.<sup>[1]</sup>

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<sup>[1]</sup> CalCCA made the same recommendation in its June 20, 2023 *Comments on the June 6, 2023 CAISO RA Workshop: Current Processes and Interoperability with the CPUC's Slice of Day Reform*: <http://www.aiso.com/Documents/CalCCA-Comments-Resource-Adequacy-Enhancements-Slice-of-Day-Workshop-Jun062023.pdf>.

2. Please provide your organization's comments on the CPM Enhancements Track 2 straw proposal.  
See response to (1) above.
3. Please provide your organization's comments on the proposed alternate schedule for the CPM Enhancements Track 2 initiative. The alternate schedule would accelerate the timeline by moving directly to a final proposal following the straw proposal. The alternate schedule would accelerate the timeline by moving directly to a final proposal following the straw proposal. Because the ISO should adopt the CPM Enhancements Track 2 straw proposal as is, CalCCA supports the proposed alternate schedule, which would move the straw proposal straight to a final proposal rather than draft final proposal.