



California ISO

Structural Elements

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CPUC Track 3B.2 Proceeding: Implementation Workshop on
Structural Elements

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Agenda

- Showing Requirements and CIRA validation
 - Seasonal vs. Monthly Showings

CAISO supports the objectives of Slice of Day

- CAISO appreciates the CPUC's recognition that the changing resource mix warrants a revised resource adequacy program
- CAISO supports the goal of ensuring that the RA program address key operational concerns, such as a moving away from gross to net load peak, and modifying RA requirements to ensure that both energy and capacity needs are met in all hours

Overview of CAISO's Customer Interface for Resource Adequacy (CIRA)

- CIRA is a CAISO application that provides an external user interface to manage the ISO's resource adequacy needs
 - Allows Scheduling Coordinators (SCs) to submit their annual and monthly Supply and Resource Adequacy plans
 - Provides the mechanism to support SCs to perform substitutions on RA and CPM for planned and forced outage substitution
 - SCs can submit NQC results, view NQC reports, and download NQC templates previously submitted
- Resource Adequacy Plans identify the specific resources the Load Serving Entity is relying on to satisfy its forecasted monthly Peak Demand and Reserve Margin
- Supply Plans verify the information contained in RA Plans and establish the formal RA commitment between the ISO and the resource

CIRA is an in-house developed application and is difficult to modify to accommodate new RA structures

- If the CPUC elects to have multiple RA requirements, CIRA is only configured to validate a single forecast and reserve margin to validate all LSEs' RA plans
- The ISO is evaluating the potential impacts the Slice of Day Framework would have on CIRA and other downstream systems, and has concerns about the additional complexity Slice of Day may introduce
- The CAISO is committed to working with parties to ensure that the CPUC and ISO RA Programs remain compatible, but must also recognize these technical constraints that may impede the CAISO's ability to administer the slice of day framework in its entirety

CAISO recommends that CIRA be modified to validate showings at the Net Load Peak

- CAISO has observed that the most operationally challenging periods have moved from the gross to the net load peak
- CAISO recommends that the Slice of Day Framework be structured around meeting forecasted demand and reserve margin at 8pm
 - CIRA could be modified to validate showings against the CEC load forecast plus reserve margin at 8pm. However, CAISO likely will not be able to validate compliance in other slices given the limitations of the CIRA application. These slices could be validated through an ex-post portfolio assessment
 - Parties should also work to get all resources shown on RA and Supply plans to ensure contracted RA can be operationalized in the ISO markets

Seasonal Showings Option

- CAISO has the capability to move its RA compliance from monthly to seasonal requirements, and would not oppose doing so.
- However, parties should be aware that final compliance would remain at T-30 from the first day of the season
 - In other words, showings for Summer (June-August) would need to be finalized by May 1st for the entire 3 month period
 - Given the expected influx of new resources over the next 5-10 years, moving to seasonal showings may increase the risk of new resources that come online mid-season being unable to provide RA until the next seasonal showing
 - May be more advantages to maintain monthly showings requirements at the ISO, and LSEs can submit the same seasonal portfolio for each month of that season

In Summary:

- 1. RA Requirements and CIRA:** Given the limitations of CIRA, the CAISO is committed to working to ensure that the CAISO and CPUC RA programs remain compatible, but may not be able to administer Slice of Day in its entirety
- 2. Showings Validation at Net Load Peak:** CAISO recommends CIRA be modified to validate Supply and RA plans against CEC load forecast plus reserve margin at 8pm
- 3. Seasonal vs. Monthly Showings:** CAISO is open to moving RA compliance from monthly to seasonal requirements, but this will change compliance timelines for RA showings