Notes from RA Reform Workshop 8/3/22

The first presentation was by Lynn Marshall of the CEC. (See slides.). She said each LSE is to provide a load forecast for 24 hours per month for its own noncoincident peak. It can also provide 8760 hours. The CEC will take out the automatic transmission load adjustment since it only applies to the peak. It will then adjust the LSE forecast for transmission losses and UFE. If the results are made public in September/October and changes are needed, staff will put the changes into the record for a 1Q 2023 decision. CEC is not sure transmission losses are the same in all hours. The level is 3% for the peak hour but could vary in other hours. The CEC load forecast is at the generation level. The LSEs only have distribution losses at all hours and the CEC is not sure about transmission losses in all hours. The key issue is how the hourly forecast is done for each.

ED presented next. (See slides.). The first slide reviewed requirements from App. A of D. 22-06-050. EBCE asked how use limitations would be reflected if there is a 24-hour MOO but the resource is only expected to run part of the day and not necessarily continuously. ED said use limitations are picked up in “continuous hours run energy and charging efficiency” which does not have a limit on the hours of availability. Physical limitations and use limitations (like DR, hydro, nighttime limitations) would be included. There is no way to incorporate a limit on the number of starts. This will have to be tracked across months or the year. SCE said daily start limits would be reflected but not monthly or longer. The data base would be public. All resources would continue to have 24/7 MOO up to their use limits. CAISO agreed. ED does not want storage resources to show just 4 hours. SCE said there are very few resources with hourly capability limits except DR, imports, and noise abatement. Vistra said the data base should reflect 5-hour charge, 4 hours output twice a day, which accounts for roundtrip efficiency. SCE said the LSE should know what it can do. This should be able to be calculated from what is in the master database. Vistra asked if daily cycle limits would be included. ED said this is TBD. It is not reflected in the CAISO Masterfile.

NRDC asked how the database will interact with the PRM calibration process. The data for counting rules will interact with PRM via the LOLE study. Can these data be made public and inform LOLE calculations? ED said this was a good question and that it had a timing slide. NRDC said its tool was simplified and there could be more specificity.

ED said an additional field could be added if UCAP-light is adopted. CalPA said it would be useful to add additional data like LCA, CalEnviroScore, etc. to make the database more broadly useful. ED agreed.

All resources must be in the database to provide RA.

Re Slide 13 – allocators – a question for parties is whether to continue to use load ratio share at peak. Right now CAM is allocated using 12-CP, which is peak, but DR varies by utility. How should it be allocated? Should CAM be allocated by slice or resource level rather that across slices? How to handle energy storage charging needs and how to allocate energy sufficiency requirement among LSEs getting CAM storage?

Constellation cited the massive IRP data template and cautioned against have two different ones. ED said it would check with IRP staff. MRP asked what allocation of CAM resources by slice means. ED said allocation of CAM could vary by hour and this would mean having to hard code MW values for each hour. This would not allow LSEs to show their part of the resource differently across hours. LSEs should be able to show a resource in the hours it chooses. There could be a mismatch if compliance is based on hard coded hourly figures. The hours might not add up if you base compliance on hours the LSE shows debit and credit. ED thinks an LSE that gets CAM’ed resources should be able to choose the hours to show it for RA. This is separate from when the CAISO dispatches the resource.

SCE then presented. (See slides.)

Vistra thinks database should include both planned and commercially available resources. It should include queue number and queue ID, which can come from RIMS (CAISO queue database). Hybrid MW can also come from RIMS.

SCE – resource owner should provide the information. RIMS can be used for CPUC staff validation.

Vistra – could ask CAISO to create a report to send data to the CPUC; RA seller would provide queue number and resource ID. Max daily run hours and max continuous energy are key for storage; latter incorporates storage efficiency. MRP says best for CPUC to get data from CAISO and asks how new resources can use queue; also, how would you treat imports that are not on the NQC list? SCE responded would not include imports in data list but would be in the database. (*Did I get this right*?)

ED: we currently have an NQC list that has an “under construction” tab. Do not know about the queue. Under construction OK to use in year-ahead but not month-ahead. It includes pseudo-tied resources but not unspecified resources. Vistra: Can a buyer not contract a resource unless it is in the database? SCE: seller would indicate what resource could count for; this is the way resources are contracted today; thinks seller would provide information to CPUC to apply for RA. Vistra: should account for planned resources; RIMS data can be catalogued; these data should match what is in RIMS. EBCE: will have to modify after test run.

SCE led validation logic discussion. Agreed no need to use exceedance for dispatchable resources. There was a discussion of how to treat multi-cycle storage. SCE said it thinks its proposal for multi-cycle storage downtime enforcement is not correct and asked for feedback. It proposed to treat paired resources differently depending on whether charged with paired renewable or also grid. Further discussion will occur next week.

SCE said MCC buckets would still be needed for resources that can only produce so many hours per day or month. Those with need limits beyond daily include DR and imports.

SCE said an IRP study should not be used for RA and there should be more discussion of monthly vs. annual LOLE.

MRP asked how you would determine the amount of downtime for multi-cycle storage. SCE would like to do this without monitoring state of charge. It is not clear if this can be done. More LSEs will be using storage to fill in their load shapes so it will be cycled more than once per day.