

## **CPUC Resource Adequacy Workshop**

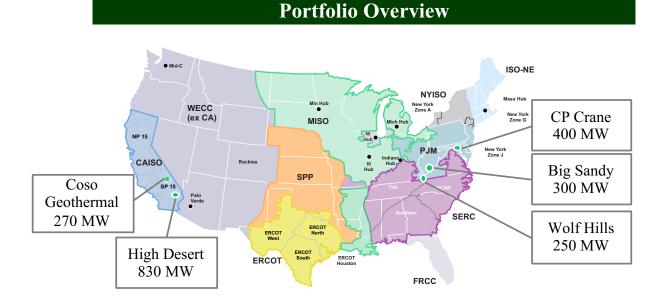
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#### Description

- Founded in 2016, Middle River Power ("MRP") currently manages over 2,000 MWs of generation in the United States
- California Portfolio consists of:
  - 830 MW High Desert Combined Cycle Gas Turbine Facility Victorville
  - 270 MW Coso Geothermal Facility China Lake
  - 100 MW High Desert PV Solar Development
- Additional facilities totaling 950 MWs of generation in PJM including CP Crane, Big Sandy, and Wolf Hills





#### **Issues Requiring Attention**

- Monthly forecasting methodology needs to be replaced with an annual procurement target that reflects the realities of a power grid with significant and growing variable energy resources
  - Reserve margins have been tested on numerous occasions in 2017
- RA contracting process is broken and causing unnecessary challenges
  - Generators' revenue paradigm has shifted
  - Efficient run profiles have lowered energy revenues, requiring more RA revenue certainty
  - Evolution of customer choice has increased the number of LSEs
- Supply needs to be provided with fair, long-term price signals
  - Transparency is critical to market success
  - Time for transition to 100% renewable supply is critical once units retire they are gone for good
  - SB 350 requirements should be included in the design to balance costs, GHG reductions and reliability

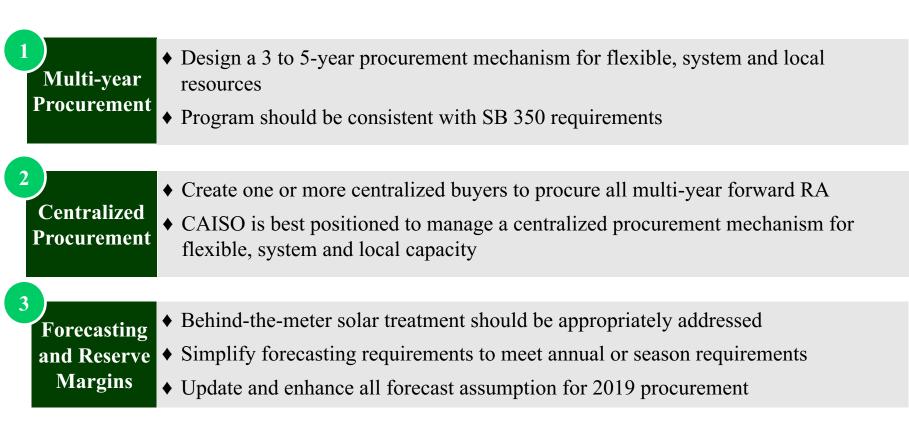


**Rationale for Change** 

- ➢ RA system requirements have fallen short in critical periods of 2017
- ELCC needs to be applied in a consistent and coordinated manner behindthe-meter solar should be counted the same as after-the-meter
- > Antiquated process is creating an unfair barrier to entry for CCAs
- ➤ Resource supply and need continue to shift drastically
- Generators need to operate and plan annually monthly procurement just concentrates revenue requirements



MRP believes the following items should be addressed in Track 1. Fixing forecasting and planning reserve margins are fundamental to achieving a successful program in 2019.





### Forecasting and Planning Reserve Margin

- Forecasting deficiencies should be addressed in Track 1 to set a foundation for 2019 RA procurement
- Elements to be addressed:
  - 1-in-2 forecasting examine whether 1-in-2 procurement forecast remains appropriate
    - o CAISO suggested in their recent comments changes are necessary
    - o Recent weather and load volatility confirms need
  - **Revise Planning Targets** set appropriate seasonal and/or monthly reserve margins
    - Reserve targets need to be set on resource performance, weather volatility and interchange capability
    - Appropriate reserve margins will reduce costly backstop procurement
  - Effective Load Carrying Capacity (ELCC) reflect consistent and accurate approach between RA and IRP ELCC values
    - All solar should be evaluated the same for RA purposes
  - Shift to Seasonal or Annual RA Requirements current monthly construct is problematic
    - o Generators need annual revenue requirements to remain viable
    - o Monthly granularity is needlessly complex and creates false precision
    - Other ISOs and RTOs have demonstrated success without the monthly framework



# **Questions?**

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