



Submit comment on 4/14 meeting and BPM policy changes

Initiative: Storage design and modeling

1. Please provide your organization's comments on the April 14th meeting and related materials. *

The California Community Choice Association (CalCCA) appreciates the opportunity to comment on Proposed Revision Request (PRR) 1627. The PRR aims to address a shortcoming in the current state-of-charge (SOC) calculation. That is, the SOC calculation does not consider the impact of the flexible ramping product (FRP) on the SOC. CalCCA agrees with the CAISO that this issue must be addressed to prevent adverse reliability and price formation outcomes, and that CAISO should implement a solution for this summer (2025). However, the solution proposed by the CAISO in the PRR appears to have shortcomings, as discussed below, that necessitate the development of a long-term solution in the Storage Design and Modeling stakeholder initiative that can replace the solution proposed in the PRR after this summer.

For example, the proposed BPM language in the PRR only includes flexible ramping up (FRU) in the calculation and not flexible ramping down (FRD) so that the two types of awards do not offset each other. While this approach may be reasonable for this summer, when the ability to obtain FRU is higher priority, both types of awards can impact a resource's SOC. Therefore, the CAISO should explore how both awards could be incorporated into the long-term solution.

Upon implementation of the proposed PRR language, and while the long-term solution is being developed, the CAISO should report out monthly on the results of this change to demonstrate whether it has performed as intended and whether there were any unintended consequences. If major unintended consequences arise, the CAISO should have the ability to roll back the calculation to its original state. This reporting can inform the long-term solution to be developed in the Storage Design and Modeling stakeholder initiative.

CalCCA also recommends the CAISO document all storage constraints for all markets in one place, so stakeholders can evaluate this proposal and other forthcoming proposals in the Storage Design and Modeling initiative. At present, it is difficult to track and define all the terms in the storage resource constraints and having one place with all this information will help stakeholders better assess the merits of proposed calculation changes.