



Submit comment on Straw proposal

Initiative: Planning standards - remedial action scheme guidelines update

1. Please provide a summary of your organization's comments on the Planning Standards - Remedial Action Scheme (RAS) Guidelines Update straw proposal and September 26, 2022 stakeholder call discussion: *

CalWEA generally supports CAISO's efforts simplifying the RAS design. However, the proposal guidelines could have significant impacts on the generation projects currently in the interconnection queue, in terms of the network upgrade requirements, the cost of both network upgrades and interconnection facilities, the timeline for interconnection, and the deliverability. CalWEA urges CAISO to fully investigate the impacts before moving forward with the proposal and provide the evaluation to the stakeholders.

2. Provide your organization's comments on the removal of redundant language in the RAS guidelines, as discussed in section 3.1: *

CalWEA supports the proposal.

3. Provide your organization's comments on the proposed updates to the RAS guidelines, as described in section 3.2: *

CalWEA is concerned about the implementation of the proposed guidelines on both the existing RAS and the new RAS identified in the generation interconnection process. Please clarify how the RAS designs would have to change if not compliant with the proposal. If CAISO is going to grandfather RAS designs already in place, please specify which ones will get such treatment. In addition, CalWEA has the following specific comments.

G-RAS3.A and G-RAS4.G are overlapping and may be reconciled into one. Dynamically arming and tripping could be allowed if it is fully automatic and completely mitigates reliability concerns such that the contingency conditions triggering the RAS need don't need to be monitored in market operations.

Using the P_{MAX} to set tripping amount in G-RAS6 is too restrictive and compromises the effectiveness of the RAS. As long as the RAS is fully automatic and completely mitigates the reliability concerns, it could trip actual generation up to 1150 MW or 1400 MW.

G-RAS4.E is limiting the overloading facilities monitored by a RAS to no more than 1 substation beyond the first point of interconnection. This is too restrictive and not necessary since G-RAS3.B sets the threshold for effectiveness of the generator tripping.

As a 10% effectiveness threshold is set in G-RAS3.B, CAISO should consider applying the same threshold in the generation interconnection process for assigning RAS cost responsibility.

CAISO should standardize the cost treatment of bridge RAS in G-RAS7. As the cost treatment may belong to a different stakeholder initiative, CAISO should clarify the current practice and open the topic to future stakeholder comments and enhancements.

4. Are the proposed planning guideline updates sufficiently clear for understanding? If not, which specific proposed guidelines or standards would need further clarifications? *

Please refer to comments in No. 3.

5. Do the proposed guideline and standard updates help in simplifying RAS design and implementation? *

Please refer to comments in No. 3. CalWEA recommends that a more complicated RAS design be allowed as long as the RAS is fully automatic and completely mitigates the reliability concerns.

6. Do the proposed guideline and standard updates help address your concerns in implementing new RAS to connect new resources and/or to maintain transmission reliability? If not, what are the suggested enhancements? *

Please refer to comments in No. 3.

7. Do you have any further suggestions to the proposed guideline and standard updates? *

Please refer to comments in No. 3.

8. Provide any additional comments on the Planning Standards - Remedial Action Scheme Guidelines Update straw proposal and September 26, 2022 stakeholder call discussion: *

Please refer to comments in No. 3.