



Submit comment on May 15 stakeholder discussion and straw proposal for track 2

Initiative: Resource adequacy modeling and program design

1. Please provide your organization's overall feedback on the Resource Adequacy Modeling and Program Design Track 2 Straw Proposal. *

CalWEA joins the Large-scale Solar Association (LSA) in calling on CAISO to rethink the vague and unjustified proposed application of RAAIM to variable energy resources (VERs) and generally endorses LSA's comments.

2. Please submit your organization's comments on the RAAIM Reform Proposal. The ISO welcomes stakeholders' specific suggested changes to improve or clarify the proposal. *

As LSA explains in its comments, VERs were originally exempted from RAAIM because most wind and solar project PPAs provide for a single, volumetric payment on a bundled basis for energy, capacity, and renewable energy credits. This structure incentivizes maximum availability and production, which will not improve under RAAIM capacity-based incentives. This PPA structure remains the standard for new projects. Once projects' initial PPAs expire, some VERs may use unbundled contract structures, including bilateral RA contracts. However, these projects remain price-taking, non-dispatchable resources. VERs are not subject to the same Day-Ahead Must-Offer Obligation framework as dispatchable RA resources; their RA availability is tied to available capacity and forecasted generation rather than dispatchable Day-Ahead bids. CAISO has not explained how a RAAIM construct focused on Day-Ahead bidding and dispatchable-resource obligations would apply to VERs.

Given these contract structures and VERs' non-dispatchability, CAISO has provided no evidence that subjecting VERs to RAAIM would provide any reliability benefits, nor has it thought through the details of how RAAIM would apply to VERs, as the presentation focused on dispatchable resources. Any penalties on VERs that do not (and cannot) improve performance would unfairly disadvantage these renewable resources relative to dispatchable resources.

Further, many legacy wind projects were built before today's CAISO dispatch and RAAIM framework and were not designed for frequent automated curtailment or dispatch-following operation. Some older fixed-pitch turbines rely on mechanical braking that can cause significant wear and tear, and older SCADA/control systems may not support modern dispatch-following functionality. These are not resources that can be treated like a gas plant, a battery, or a modern, fully dispatchable resource. Should CAISO demonstrate that exposing VERs to RAAIM would provide significant reliability benefits, which CalWEA believes is unlikely, CAISO should, at a minimum, preserve an exemption or develop tailored treatment for legacy wind projects that were not designed or equipped for frequent automated curtailment or dispatch-following operation.

If CAISO proceeds with this proposal, it should first provide evidence that RAAIM would improve VERs' operating behavior, explain how RAAIM would apply to VERs given their unique Must-Offer Obligations, and provide an opportunity for stakeholder discussion on this information.

3. Please submit your organization's comments on the Bidding Requirements/Must-Offer Obligation Next Steps. *

CalWEA emphasizes that CAISO must provide a VER-specific explanation of applicable Must-Offer Obligations before proposing to apply RAAIM to VERs. Many VERs, including legacy wind resources, are price-taking, non-dispatchable resources and do not have a Day-Ahead Must-Offer Obligation. Their real-time availability is tied to available capacity and forecasted generation, not economic bidding or NQC-based dispatchable obligations. CAISO should not assume that wind or solar resources can respond to RAAIM incentives in the same manner as gas, storage, or other dispatchable resources.

This is especially important for legacy wind resources that lack modern SCADA/control systems, turbine-level dispatch-following capability, and staffing models designed to follow ADS Dispatch Operating Targets. The fact that a legacy wind resource may sell RA separately does not make it dispatchable or capable of responding to RAAIM incentives in the same manner as resources designed for dispatch-following operation.

4. Please submit your organization's questions or comments on the Outage Substitution Enhancements Next Steps. *

CalWEA has no comments at this time, except to emphasize that outage substitution enhancements should not be used as a substitute for VER-specific analysis of whether RAAIM should apply to VERs at all. CAISO should first demonstrate that applying RAAIM to VERs would produce incremental reliability benefits before assuming that outage substitution rules can resolve the operational differences between VERs and dispatchable resources.

5. Please submit your organization's comments on the Outage Definitions Proposal. *

CalWEA has no comments at this time on the specific outage definition changes, except that changes to outage definitions should not be conflated with elimination of the existing VER resource-type exemption from RAAIM. Resource-type exemptions and outage-type exemptions are separate issues. Reforming outage definitions does not establish that VERs should be newly exposed to RAAIM.

6. Please provide any additional feedback not already captured.

CalWEA reiterates that CAISO should not eliminate the existing VER exemption unless and until it provides VER-specific data and analysis demonstrating that RAAIM would improve reliability for VERs. The current proposal appears to rely heavily on concepts applicable to dispatchable resources, without explaining how the mechanism would apply to price-taking, forecast-based, non-dispatchable wind and solar resources. CalWEA therefore urges CAISO to remove the proposed expansion of RAAIM to VERs from this initiative or, at a minimum, defer any such change until CAISO develops a detailed VER-specific proposal and provides stakeholders a meaningful opportunity to review and comment on it.