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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Table with 2 columns: Description of proceedings and Case Number (RM 10-023).

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INFORMAL COMMENTS OF THE LARGE SCALE SOLAR ASSOCIATION ON DRAFT STAFF RECOMMENDATIONS ON PROBABILISTIC MODELING AND ASSUMPTIONS

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Contact information for Rachel Gold, Policy Director of Large Scale Solar Association.

December 10, 2013

Order instituting Rulemaking and Rulemaking Oversight of the Resource Program, and Consideration of Program Refinements, and Establishment of Local Procurement Obligations	Rulemaking 11-023
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INFORMAL COMMENTS ON THE LAKE SOLAR ASSOCIATION DRAFT RECOMMENDATIONS ON MODELING INPUTS AND ASSUMPTIONS

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The Solar Energy Association (SEA) appreciates the Solar Energy Association's (SEA) comments on the

provide comments on the draft recommendations on modeling inputs and assumptions

Inputs and Assumptions (Data) below we address the

First, the need for a demand response program is

results for the effective load carrying capacity (ELCC) model

policy decisions that will be made in the near future

how the solar generation profiles in the near future

solar cities.

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1. ELCC Roadmap

2020

SEA understands the Commission's understanding of ELCC

effort has required improvements in how the

Commission's interest in these programs are aware of this

modeling represents a major step in the development of

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is concerned that the Commission is moving forward with first setting clear standards about the benefits of this modeling be as how the Commission has addressed its substantive or other proceedings. Some of the other issues that address include:

- How often will QC be calculated under this method?
- How will the wind and solar resources used for existing contracts be used for existing contracts? What impact is guaranteed by negotiated existing QC counting rules?
- What hours of operation should be assessed to attribute wind and solar resources using the ELCC model?
- Will this methodology be used for the entire RA area change impact? What is the RA market?
- Will the NQC determination and how is the methodology for NQC changes? How will that impact methodology and what delivery network upgrades are?
- Should this methodology be used in Phase 1 on LSA?

LSA recommends that more clearly defined issues will be addressed. It is important to start with the issues in advance of completing the modeling in order to provide where this effort is heading to help us understand how to smoothly implement the new QC standards and understand the potential impacts of these changes.

capabilities of the solar energy business and the limitations of the publicly available weather data

Dated: December 10, 2024 Respectfully Submitted,

/s/ Rachel Gold

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