

Rulemaking

Order

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order

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Order Instituting Rulemaking  
Oversee the Resource Program,  
Consider Program Refinements,  
and Establish Local Procurement

Rulemaking Order

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**INFORMAL COMMENTS FROM THE LARGESCALE SOLAR ASSOCIATION ON THE DRAFT STAFF RECOMMENDATIONS ON PROBABILISTIC MODELING AND ASSUMPTIONS**

Order

modeling<sup>2</sup> represents<sup>2</sup> a major<sup>2</sup> challenge<sup>2</sup> for the<sup>2</sup> California<sup>2</sup> utility<sup>2</sup> industry<sup>2</sup>.

Commission<sup>2</sup> initiatives<sup>2</sup> implementation<sup>2</sup> of these<sup>2</sup> regulations<sup>2</sup> will<sup>2</sup> be aware<sup>2</sup> of this<sup>2</sup> effort<sup>2</sup>.

Has<sup>2</sup> required<sup>2</sup> the<sup>2</sup> utility<sup>2</sup> industry<sup>2</sup> to<sup>2</sup> understand<sup>2</sup> how<sup>2</sup> the<sup>2</sup> LSCC<sup>2</sup>

in<sup>2</sup> LSCC<sup>2</sup> understands<sup>2</sup> the<sup>2</sup> commission<sup>2</sup> is<sup>2</sup> under<sup>2</sup> review<sup>2</sup> by<sup>2</sup> the<sup>2</sup> NERC<sup>2</sup>

2020

## 1. ELCAC Roadmap

solar<sup>2</sup> facilities.<sup>2</sup>

how<sup>2</sup> the<sup>2</sup> solar<sup>2</sup> generation<sup>2</sup> profiles<sup>2</sup> will<sup>2</sup> be<sup>2</sup> used<sup>2</sup> in<sup>2</sup> the<sup>2</sup> development<sup>2</sup> of<sup>2</sup> the<sup>2</sup> market<sup>2</sup>.

Policy<sup>2</sup> decisions<sup>2</sup> that<sup>2</sup> will<sup>2</sup> influence<sup>2</sup> the<sup>2</sup> market<sup>2</sup> and<sup>2</sup> adoption<sup>2</sup> of<sup>2</sup> about<sup>2</sup> U

results<sup>2</sup> of<sup>2</sup> the<sup>2</sup> effective<sup>2</sup> load<sup>2</sup> carrying<sup>2</sup> capacity<sup>2</sup> (ELCC)<sup>2</sup> mo

First,<sup>2</sup> the<sup>2</sup> needed<sup>2</sup> for<sup>2</sup> a<sup>2</sup> generation<sup>2</sup> map<sup>2</sup> to<sup>2</sup> the<sup>2</sup> market<sup>2</sup> what<sup>2</sup> in

Inputs<sup>2</sup> hand<sup>2</sup> assumptions<sup>2</sup> (data<sup>2</sup>) below<sup>2</sup> we<sup>2</sup> address<sup>2</sup> the<sup>2</sup> inputs<sup>2</sup>

provide<sup>2</sup> comments<sup>2</sup> on<sup>2</sup> the<sup>2</sup> draft<sup>2</sup> staff<sup>2</sup> recommendations<sup>2</sup> on<sup>2</sup> the<sup>2</sup> draft<sup>2</sup>

in<sup>2</sup> The<sup>2</sup> hope<sup>2</sup> the<sup>2</sup> solar<sup>2</sup> association<sup>2</sup> (LSA)<sup>2</sup> appreciates<sup>2</sup> the<sup>2</sup> opportunity<sup>2</sup>

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## AND ASSUMPTIONS

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Local<sup>2</sup> procurement<sup>2</sup> no<sup>2</sup> longer<sup>2</sup>

Refinement<sup>2</sup> hand<sup>2</sup> the<sup>2</sup> established<sup>2</sup>

Program<sup>2</sup> consider<sup>2</sup> the<sup>2</sup> program<sup>2</sup>

Oversee<sup>2</sup> the<sup>2</sup> resource<sup>2</sup> rulemaking<sup>2</sup>

Order<sup>2</sup> the<sup>2</sup> rulemaking<sup>2</sup> rulemaking<sup>2</sup>

Rulemaking<sup>2</sup> MP-023<sup>2</sup> in<sup>2</sup>

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OF THE STATE OF CALIFORNIA

BEFORE THE PUBLIC UTILITIES COMMISSION

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is concerned that the Commission is moving forward with the first setting of climate performance standards of this proceeding to be how the Camington address is presented in this or other proceedings. Some of the questions that have been raised include:

- How often will QC be calculated under this method
- How will wind and solar resources used in the ELCC derived is used for existing contracts that impact guaranteed payments negotiated with existing QC counting rules that are used for contracts with what is impact
- What hours of operation should be assessed to what wind and solar resources used in the ELCC model?
- Will this methodology be used for the entire RA or a change in impact that RA market?
- Will the NQC determination methodology for NQCs changes how will that impact methodology for NQCs changes what delivery network upgrades are used in the methodology and what delivery methodology is used for NQCs?
- Should the methodology be used in planning long term?

LSA recommends that more clearly mandatory issues will be addressed. It is important to start with the new mandatory issues in advance of completing the modeling in order to provide where this effort is heading. It is important to understand the impacts of these changes.

## 2. LSA's Recommendations for Solar Generation

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The Draft Recommendations outline several possible ways to increase production by incorporating data from developers' utilities using the state-of-the-art neural network model based on the data current understanding of how the SERVM model works. It is 30 years since the first solar panel array was installed, and solar data for this period is well documented. The fusion of ISO data with modeling techniques is likely to result in more accurate generation profiles than those from historical solar performance data, particularly when the NREL model is used. The LSA recommends that shallow projects utilize this option of solar forecasting or production profiles for multiple years of historical data using GOMA weather data and NREL satellite data from readily available sources (such as the Weather Web). While the plan may not necessarily have to remain independent of the brief, it can help to validate the approach presented here for solar forecasting outside thermal facilities without storage, wind, and solar projects outside California.

LSA also recommends that project sponsors provide generation profiles based on multiple years of specific weather from an accredited source. This will ensure that the production profiles represent the actual

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capabilities of the solar industry's potential and limitations of the publicly available weather data

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Dated: December 2014 Respectfully Submitted,

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