

## Comments received on the ADS process work flow proposed by the SDWG/PDWG

The following summarizes comments on the ADS process work flow proposed by SDWG and PDWG. The proposed work flow was presented to the ADSTF during their 8/16/2019 webinar.

Jan		
No.	Comment	Response
1	In box 3b, I would not use the term “unit commitment.” “Unit commitment” has a specific meaning in the PCM (committing unit’s for the following day’s dispatch), but I don’t believe that is what box 3b is trying to capture. Instead of the phrase “unit commitment,” I suggest using the term “resource.” actually	Using the term “resource” does not adequately convey the intent of the process in “box 3b”. The intent of this box is to take the limited information provided by the PF (generating capacity and location) and add other data that enables the hourly dispatch; heat rates, fuel cost, operation constraints, bidding information that allows the PCM to “commit” the unit in the PCM; ultimately, completing generator modeling in PCM to generators coming from Yr (x) PF There is acknowledgement that the internal processes that reside with “box 3b” are not described in the process work flow but will be in the DDVM where the details of how the information in “box 3b” will be developed. To address the use of the term “commitment” the text in box 3b will be replaced by “Update generation information that allows the PCM to hourly dispatch units using Yr(x-2) PCM and park non-matching resources”.
2	I suggest using terms other than “HS3” and “HS4” to describe these two power flow cases. As I understood Ron’s and Jonathan’s comments from today, power flow users generally understand “HS” to mean non-coincident peak summer loads across each of the various WECC data submitter’s systems. Since these two power flow cases will reflect coincident peak summer loads across all of the WECC data submitters’ systems, I think we need different terms. For the proposed process workflow document, I suggest using terms such as “MS3” and “MS4” (medium summer) or perhaps “CS3” and “CS4” (coincident summer).	<p>The difference between Yr (x) HS PF using non-coincident peak loads - in box 2b, and the non-coincident loads in HS2 - box 2f, is simply the treatment of a subset of BTM resources that is netted from loads in HS versus how it is modeled as generation in HS2. Both scenarios have non-coincident peak loads, and therefore using “Heavy Summer” applies to both.</p> <p>Loads in HS3, box 4h, should remain the non-coincident peak loads, provided that the export hour from PCM-2 is the same as was used to compile the HS PF case.</p> <p>However, loads are changed for HS4, box 5f, replacing non-coincident peak load with the coincident hourly forecast--still modeling a summer hour but not all BAAs peak simultaneously.</p> <p>The round-trip works best if the Y(x) PCM-2 export hour is the same as the hour used to compile the Y(x) HS case; both have the same non-coincident peak load hour.</p>

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3	<p>Box 4e needs to be relabeled because we do not get “hourly loads” from the “L&amp;R data.” Maybe we need to (i) insert a new box between box 4d and 4e that says “Use Yr(x) forecast monthly loads from L&amp;R data, and historic hourly loads, to develop forecast Yr(x) hourly loads.”, and (ii) relabel box 4e with “Incorporate Yr(x) forecast hourly loads and validate.”</p>	<p>Agree with your comment. A new “4e” will be added and the remaining boxes relabeled.</p>
4	<p>Given our discussion today, I am hazy as to exactly what is intended for box 5c. My initial assumption was that box 5c was meant to capture the need to develop new, or link with existing, dynamic models for all resources to be added to the MS3 power flow case in order to reflect resources in the “L&amp;R” resource data. If this is not what is intended by box 5c, then I need an explanation.</p>	<p>5c is to address the possibility of needing more generation than what was modeled in past years. This box represents the process that will be followed to model the new generation.</p> <p>For example: An entity needs 10 MW of generation to achieve the requested amount of generation for the ADS. They currently have 8 MW of generation available from past PCM data sets. Box 5c would be the act of modeling the additional 2 MW of generation to achieve the 10 MW request.</p>
5a	<p>Given our discussion today, it appears that we do not have agreement on whether “all” resources in the L&amp;R data submittals to WECC are to be included in the MS4 power flow case. I got the sense that some people believe certain resources -- e.g., “Tier 3” resources as that term is defined by NERC – should be excluded from the MS4 power flow case. My view is that if a resource is included in a WECC data submitters L&amp;R data, it needs to be included in the MS4 power flow case.</p>	<p>Agree; discussion is still required to further identify and resolve the interpretation of what resources should be included in the ADS. However, this is not considered an ADSTF issue to resolve, but one for the LRTF, SDWG, and PDWG to address. That said, it is important to note that the ADSTF has already agreed that all resources submitted in an L&amp;R should be represented in the resultant ADS Reference PF in box “5f”. Unless the ADSTF chooses to modify that position, their position on this matter is clear and will be assumed in the final ADS.</p>
5b	<p>My understanding at this point is that each entity submitting L&amp;R data to WECC makes its own determination as to which of the three tiers are associated with each resource. According to NERC’s definition (page 15), “Tier 3” resources would include “Units in an interconnection queue that do not meet the Tier 2 requirement.” NERC’s Tier 2 definition captures units in the generation interconnection process, plus (i) units “Included in an integrated resource plan,” and (ii) units included in an RTO/ISO plan where the RTO/ISO is “under a regulatory environment that mandates a resource adequacy requirement.” Given these NERC definitions, I wonder if any WECC data submitter would classify any generator as a Tier 3 unit. Maybe there are municipal utilities that do not conduct an integrated resource plan such that any conceptual resource would be designated as Tier 3 resource? Maybe WECC data</p>	<p>That is correct that each submitting entity determines which tier units are assigned. However, there are some units identified as being tier 3 by most of the submitters. If it would be helpful to see examples, I can work with those who collect that data and see if we can look at a list of what is tier 3 that has been provided. My brief experience in looking at the data there is a significant amount of MW included in tier 3 and that generally for the LTRA the tier three resources are not used.</p>

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	submitters would designate Behind-The-load-Meter (BTM) resources as Tier 3 units since they are inputs to, and not products of, an integrated resource plan?	
5c	Possibly this will turn out to be a non-issue if, in fact, WECC data submitters do not give any of their resources a Tier 3 designation. We need to discuss and explore this further.	Agreed that this will be a non-issue that if data submitters do not give any of their resources Tier 3 designation. However, Tier 3 only includes facilities that have studies completed and interconnection agreement requested. It does not specifically cover the resources that are in the study process, even though they may have been in the IRP. So, to be complete, we should also include Tier 3 resources if only to provide that choice.
6	The proposed process workflow document does not indicate how transmission additions included in the L&R data submittals to WECC, but not included in the MS3 power flow case, are going to be handled. My initial opinion is that such transmission additions should be added to the MS3 power case to create the MS4 power flow case.	While it is understood that the L&R submittals provide the opportunity for the data owner to submit transmission additions that may not have been captured in the Task 2 part of the process then intent of “box 5b”, “box 5c”, and “box 5d” is to ensure that all of the data in the L&R is reflected in the HS3 PF to create the HS4 PF. It may be that the appropriate part of the process to address added transmission facilities would be in Task 4 where SDWG can review this information in Task 5.

**Radha**

No.	Comment	SDWG/PDWG Response
1	<b>Box 2d</b> – this comparison should be shared at both SDWG and PDWG for the stakeholders to know the differences and what is eventually included into PCM. A detailed report discussion and approval will be helpful for both the groups.	The availability of this information will be described in the DDVM which will be developed, maintained, and approved by the PDWG.
2	<b>Box 4f</b> – A list of parked resources in the PCM, any differences in load or other details should be documented for this data set. This might be used by some entities as starting point for their studies.	The availability of this information will be described in the DDVM which will be developed, maintained, and approved by the PDWG.
3	<b>Box 5d</b> – What is the modeling for planned resources for which no bus number was provided by SDWG? These assumptions should be discussed and approved by MS or DS for future modeling practices.	The processes followed to determine the mapping information will be described in the DDVM which will be developed, maintained, and approved by the PDWG.

**Name?**

No.	Comment	SDWG/PDWG Response