DOCKETED	
Docket Stamp Updated:	1/22/2021 11:37:31 AM
Docket Number:	20-MISC-01
Project Title:	2020 Miscellaneous Proceedings.
TN #:	236003
Document Title:	Vista Corp Comments - on Initial Public Workshop on Long Duration Energy Storage Scenarios
Description:	N/A
Filer:	System
Organization:	Vistra Corp.
Submitter Role:	Public
Submission Date:	12/17/2020 4:35:07 PM
Docketed Date:	12/17/2020

DOCKETED	
Docket Number:	20-MISC-01
Project Title:	2020 Miscellaneous Proceedings.
TN #:	236003
Document Title:	Cathleen Colbert Comments - on Initial Public Workshop on Long Duration Energy Storage Scenarios
Description:	N/A
Filer:	System
Organization:	Vistra Corp.
Submitter Role:	Public
Submission Date:	12/17/2020 4:33:29 PM
Docketed Date:	12/17/2020

Comment Received From: Cathleen Colbert
Submitted On: 12/17/2020
Docket Number: 20-MISC-01

Vistra Corp Comments on Initial Public Workshop on Long Duration Energy Storage Scenarios

Additional submitted attachment is included below.

Cathleen Colbert
Director, CAISO Market Policy
Regulatory Affairs
412-720-7016
cathleen.colbert@vistracorp.com

12/17/2020

California Energy Commission
Docket Unit, MS-4
Docket No. 20-MISC-01
1516 Ninth Street
Sacramento, CA 95814-5512

SUBJECT: Initial Public Workshop for Comments on Long Duration Energy Storage Scenarios

Vistra Corporation ("Vistra") appreciates the opportunity to comment on the Initial Public Workshop for Comments on Long Duration Energy Storage Scenarios held on December 3, 2020. We appreciate the California Energy Commission ("CEC") leadership in guiding California to achieving Senate Bill 100 requirement for 100% clean energy by 2045. The 100% clean energy requirement serves to transition the state to zero-carbon energy fleet complementing Renewable Portfolio Standard requiring 60% of retail sales and state sales from eligible renewable by 2030 along with Assembly Bill 2514 storage 1,325 MW target to support renewable integration.

Vistra provides 1,185 MW thermal generation capacity to the state via facilities under CEC jurisdiction located in Moss Landing and Oakland. We also serve retail natural gas products to California consumers within the state. In addition, Vistra is expanding our fleet to include battery energy storage systems at our Moss Landing and Oakland sites. As of 2021, our energy storage capacity will be 436.25 MW/1,745 MWh. We continue to explore further battery energy storage expansion opportunities. Our development of viable storage projects furthers state progress towards environmental and clean energy goals.

The workshop highlighted the important work your organization is doing to provide funding for research and development projects needed to identify what the resource mix of the future may look like. The two grants recently provided for the University of California, Merced and the Energy and Environmental Economics, Inc. ("E3") studies are helpful to advancing the discussion to address practical challenges to achieving state goals.

We believe it is necessary that modeling used in long-term procurement and planning efforts should be able to produce storage amounts by varying durations instead of a single bucket. We are encouraged that these studies, specifically E3, could inform a new modeling toolkit for such processes. We believe 4-hour battery storage will continue to provide grid services for decades to come but that the need for longer durations of storage will become increasingly important as conventional carbon-emitting resources retire or stand idle with near zero capacity factors. More granular storage results will better inform the market as to what share of the overall resource mix that the various durations are needed impacting development activities out the curve.

In the future, Vistra believes the resource mix to meet state goals will largely be made of eligible renewables, zero-carbon storage, and demand response. There may be a need to include other technologies in the resource mix, such as thermal plants with carbon sequestration technologies, to support grid needs. UC Merced's presentation acknowledges advantages and disadvantages to various candidates for a seasonal solution. We support study that could result in a recommended suite of potential technologies within an optimal portfolio that limits emissions, supplies retail sales from 100% clean energy, while also maintains grid reliability. An optimal portfolio should achieve these objectives in a least cost, least regret manner even if it requires approaches that would not fully eliminate pollution if generation segment emissions overall are de minimis.

Vistra appreciates the opportunity to provide these comments to the CEC. We look forward to further engaging in efforts to advance the discussion and contribute to the clean energy transition.

Sincerely,

Cathleen Colbert

Director, CAISO Market Policy