

Stakeholder Comments Template

Subject: Regional Resource Adequacy Initiative – Load Forecasting Working Group, June 22, 2016

Submitted by	Company	Date Submitted
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This template has been created for submission of stakeholder comments on Load Forecasting Working Group for the Regional Resource Adequacy initiative that was held on June 22, 2016. Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **July 12, 2016**.

Please provide feedback on the Regional RA Load Forecasting Working Group:

General Comments of AReM

The CAISO's Second Revised Straw proposal issued May 26th ("Revised Straw") and the presentation made on June 22nd at the Load Forecasting working group meeting ("Presentation") state that the CAISO does not plan to change the current way load-serving entities ("LSEs") develop their load forecasts or the CEC's current methodology for determining load forecasts.² However, these statements seem to be in conflict with various elements of the CAISO's proposal, which includes apparent changes to the current RA load forecasting process that applies to CPUC-jurisdictional LSEs. Some tasks the CAISO is proposing to take on include: requiring LSEs to submit load forecasts to the CAISO (Revised Straw, p. 12); determining a system-wide coincident peak (Revised Straw, p. 12); calculating the Coincidence Factor for each LSE (Presentation, p. 8). The CEC currently performs these tasks in conjunction with the CPUC's Energy Division staff and in accordance with a number of CPUC decisions stretching back to 2005. It is untenable for LSEs to be subject to conflicting requirements by CAISO tariff and CPUC regulation. AReM requests that the CAISO provide details specific to CPUC-jurisdictional LSEs, regarding the elements of its load forecasting proposal that would: (a) remain unchanged from current practice; (b) modify current practice, including the specific modifications proposed; and (c) supersede current practice, specifying which current practices would be superseded. AReM further requests that the CAISO discuss its plan for obtaining CPUC concurrence and adoption, so as to ensure uniform rules between jurisdictions.

¹ AReM is a California non-profit mutual benefit corporation formed by electric service providers that are active in the California's direct access market. This submittal represents the position of AReM, but not necessarily that of a particular member or any affiliates of its members respect to the issues addressed herein.

² See, for example, pp. 4 and 12 of the Revised Straw and p. 7 of the Presentation.