

Stakeholder Comments Template

Reliability Services Initiative - Phase 2

Second Revised Straw Proposal

Submitted by	Company	Date Submitted
<i>(submitter name and phone number)</i>	<i>(company name)</i>	<i>(date)</i>
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This template has been created for submission of stakeholder comments on the second revised straw proposal for the Reliability Services Initiative - Phase 2 that was posted on November 13, 2015. The second revised straw proposal and other information related to this initiative may be found at: <http://www.caiso.com/informed/Pages/StakeholderProcesses/ReliabilityServices.aspx>.

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **December 9, 2015**.

If you are interested in providing written comments, please organize your comments into one or more of the categories listed below.

1. Clarify Local Regulatory Authority interaction and process alignment.
2. Substitution for flexible capacity resources on planned outage.
3. Separate local and system RA for purpose of forced outage substitution.
4. Process to update EFC list during the year.
5. Masterfile changes and RAAIM availability.
 - Would CAISO please further clarify the requirements for Category 1?
 - What other parameters does CAISO look at when deciding where a resource belongs?
 - What is the process for resolving disputes over EFC values or category assigned?
 - What if the unit currently is a Category 1 Resource per the latest CAISO EFC Report (with 1 start/day in Masterfile and down time of < 12 hours) and doesn't change any of these parameters?

From page 8 of RSI Phase 2: “Although the ISO is not proposing any changes to the parameters established based on the policy that was developed in the Flexible Resource Adequacy Criteria and Must Offer Obligation (FRACMOO) and approved by FERC, the ISO has clarified the connection between starts per day and other Masterfile parameters.

From page 28-29 of RSI Phase 2: “For example, if a resource has one start per day, then it would only be eligible to provide base flexible capacity if its other operational parameters, like minimum downtime, create an operational limit that prohibits the resource from starting more once per day.²⁴ As such, changes to Masterfile parameters following Masterfile parameters can change the category flexible capacity for which a resource qualifies or if it is even eligible to provide flexible capacity at all:

- 1) Minimum down time – used to determine if a resource requires one start per day or two to qualify as a category 1 flexible capacity resource²⁵
- 2) Daily starts – Using minimum down time, resource may require either one start or two to qualify a category 1 flexible capacity resource
- 3) Dispatchability – All resources providing flexible capacity must be designated as dispatchable.

The ISO is not proposing any changes to the definitions, rules, or parameters originally established in the FRACMOO stakeholder process. As an example of how changes to the above Masterfile can impact the availability of the resource to the market, a short start resource that changes the number of starts per day from two to one would not be eligible to provide base ramping flexible capacity. Even if the resource bid into the ISO’s market for all 17 hours required under the base ramping must-offer obligation, the resource would be optimized in the ISO’s market as a short-start resource with a single start.”

6. Address the RAIM exemption currently in place for combined flexible capacity resources.
7. Streamlining monthly RA showings.
8. Other.