

Stakeholder Comments Template

Subject: Regional Resource Adequacy Initiative

Submitted by	Company	Date Submitted
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This template has been created for submission of stakeholder comments on the Third Revised Straw Proposal for the Regional Resource Adequacy initiative that was posted on September 29, 2016. Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **October 27, 2016**.

Please provide feedback on the Regional RA Third Revised Straw Proposal below.

The ISO is especially interested in receiving feedback that indicates if your organization supports particular aspects of the proposal. Alternatively, if your organization does not support particular aspects of the proposal, please indicate why your organization does not support those aspects.

Load Forecasting

1. While flexibility to provide LSE's forecast is preferred, there should be some assurance of that appropriate methods are being used by the individual LSE's. The concept of a whitepaper to discuss appropriate methods is useful, but there may need to be an obligation to assure adequate reserves are provided for.
2. Intra-year updates are only allowed when load migrates from one LSE to another. This is too restrictive and may result in capacity shortfalls. ISO may want to consider a process that allows for adjusting load forecasts for unforeseen, documented events before the summer peak period.

3. CAISO may consider the establishment of a post peak season review and highlight LSE's that are chronically missing their forecasts.
4. 50/50 forecasts should be required. Many organizations also publish a 90/10 forecast to highlight exposure to extreme events. 90/10 forecast should also be required.
5. ISO should calculate and publish the historic load modifiers to facilitate the forecasting process and to serve as a cross-check on load modifier's calculated by LSE's.

Reliability Assessment

1. Supports establishing a stakeholder process to address inputs, variables, cases and model development
2. Supports using 1-in-10 loss of load expectation in the loss of load study
3. Supports having the Western States Committee oversee the target
4. ISO proposes a "periodic" review but not annual. Initially, it is recommended the ISO do an annual review until the process is proven and the results are trusted
5. Supports proposed capacity testing during three periods: Pre-Summer, Summer and Post-Summer. This is appropriate to better capture available capacity during maintenance periods

Maximum Import Capability

The Maximum Import Capability (MIC) calculations will be impacted by new members as they join. A mechanism to address MIC should be developed by the ISO

External Resource Substitution

ISO should develop a mechanism to perform external resource substitution