Stakeholder Comments Template

Reliability Services Initiative - Phase 2
Revised Draft Final Proposal

Submitted by	Company	Date Submitted
Spence Gerber	Olivine, Inc	July 21, 2016

If you are interested in providing written comments, please organize your comments into one or more of the categories listed below as well as state if you support, oppose, or have no comment on the proposal.

1. Clarify Local Regulatory Authority (LRA) interaction and process alignment. *Please state if you support (please list any conditions), oppose, or have no comment on the proposal.*

   Olivine has no comment on this portion of the proposal.

2. Substitution for flexible capacity resources on planned outage. *Please state if you support (please list any conditions), oppose, or have no comment on the proposal.*

   Olivine has no comment on this portion of the proposal

3. Separate local and system RA for purpose of forced outage substitution. *Please state if you support (please list any conditions), oppose, or have no comment on the proposal.*

   Olivine has no comment on this portion of the proposal

4. Process to update EFC list during the year. *Please state if you support (please list any conditions), oppose, or have no comment on the proposal.*

   Olivine supports this element of the proposal since it addresses some of the unique aspects or demand response participation in RA. At this point it is not clear what the process for determination of EFC for DR resources actually is, so the ability to update EFC during the year is important for the inclusion of Demand Response resources.   The general notion that the SC can contact the CAISO to determine the need for an EFC update may be sufficient to facilitate an EFC process. Since DR resources capability can change with registration updates and the actual resource ID may not even be known during the annual process.

5. Address the RAAIM exemption currently in place for combined flexible capacity resources.
   Please state if you support (please list any conditions), oppose, or have no comment on the proposal.

   Olivine has no comment on this portion of the proposal

6. Streamlining monthly RA showings. *Please state if you support (please list any conditions), oppose, or have no comment on the proposal.*

   Olivine has no comment on this portion of the proposal

7. RA showing requirements for small LSEs. *Please state if you support (please list any conditions), oppose, or have no comment on the proposal.*

   Olivine has no comment on this portion of the proposal

8. Other

   Due to the division of the reliability service initiatives into various phases, it isn't entirely clear when the actual implementation of each phase will be effective. Since some of the elements impact annual processes with intra-year adjustments, it is difficult to determine the operational impacts since some elements of the current initiative modify processes that have yet to be implemented from previous phases. It would be useful if the CAISO could develop a timeline and/or flow chart that shows the expected timing of each and the RA compliance year in which they will be effective. As an example, this phase includes modifications to RAAIM functionality and RAAIM isn't scheduled to be activated until November 1, 2016.