

## 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 Revised Straw Proposal for the Regional Resource Adequacy initiative that was posted on April 13, 2016. Upon completion of this template please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com). Submissions are requested by close of business on May 4, 2016.

Please provide feedback on the Regional RA Revised Straw Proposal topics:

1. Load Forecasting
  
2. Maximum Import Capability

Thank you for the opportunity to submit comments. PPC appreciates the CAISO's goal of permitting LSEs' existing transmission and commercial arrangements to continue should regional expansion occur. This is a very important aspect of regional expansion. To accomplish that goal, we expect that the CAISO will propose revisions to its tariff that will allow the continued use of current transmission and commercial arrangements in expansion areas. The definition of "Existing Transmission Contracts (ETC) or Existing Contracts" is a key provision in section 40 and would need to change to accommodate the continued use of exiting transmission contract rights in demonstrating deliverability of imported resources in the resource adequacy process.<sup>1</sup> Section 40.4.6.2.1 of the CAISO's tariff contains a provision for acknowledging and preserving ETC rights as part of its process for determining import capability available for an LSE for resource adequacy purposes. These rights are limited by definition to rights in existence on the CAISO Operations Date, which is March 31, 1998. This provision, of

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<sup>1</sup> These rights should be grandfathered and made usable for physical deliverability but this is not the subject of these comments. PPC expressly does not waive raising this broader issue by setting it aside here.

course, was not written with CAISO expansion in mind, but its application would significantly damage the ability of LSEs to continue existing commercial arrangements. We request that the CAISO include its plan to make such changes in the next version of the Straw Proposal.

We also request that the ISO publish exactly how existing transmission and commercial arrangements will be “considered” in the MIC allocation process. CAISO should be explicit that parties to those transmission and commercial arrangements will be credited for the full reserved demand or MW value for PORs and PODs set out in the contracts and permitted to rely on those rights to demonstrate deliverability and qualification of capacity resources.

3. Internal RA Transfer Capability Constraints
  
4. Allocating RA Requirements to LRAs/LSEs
  
5. Updating ISO Tariff Language to be More Generic
  
6. Reliability Assessment
  - a. Planning Reserve Margin
  - b. Uniform Counting Methodologies
  - c. Backstop Procurement Authority
  
7. Other