

Stakeholder Comments Template

Subject: Regional Resource Adequacy Initiative – Working Group, August 10, 2016

Submitted by	Company	Date Submitted
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This template has been created for submission of stakeholder comments on Working Group for the Regional Resource Adequacy initiative that was held on August 10, 2016 and covered the reliability assessment topic. Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **August 17, 2016**.

Please provide feedback on the August 10 Regional RA Working Group:

Thank you for the opportunity to comment on the content of and ideas discussed at the CAISO's August 10, 2016 workshop on this topic. PPC's comments are confined to question number 4 below. Please do not hesitate to contact our office if you have any questions or need further clarification of our requests.

1. Does your organization clearly understand the examples that were intended to provide explanation of the Regional RA reliability assessment validation of LSE RA Plans and Supply Plans? If not, please indicate what further details or additional clarity your organization believes should be provided by the ISO in the future.
 - a. Please indicate if your organization believes that there are other specific examples or scenarios that are needed to aid in explaining the Regional RA reliability assessment RA and Supply Plan validations. If so, please detail the specific scenarios that your organization would like the ISO to provide examples on.
2. Does your organization clearly understand the examples that were intended to provide explanation of the Regional RA reliability assessment backstop procurement cost

allocation? If not, please indicate what further details or additional clarity your organization believes should be provided by the ISO in the future.

- a. Please indicate if your organization believes that there are other specific examples or scenarios that are needed to aid in explaining the Regional RA reliability assessment backstop procurement cost allocation. If so, please detail the specific scenarios that your organization would like the ISO to provide examples on.
3. Please provide any further feedback your organization would like to provide on the proposed Regional RA reliability assessment process.
 4. Please provide any feedback on the other discussions that occurred on the other Regional RA topics during the working group meeting.

A. PPC requests further clarification and examples regarding when the CAISO would use its uniform counting rules rather than counting rules or methodologies developed and used by LRAs. We understand that CAISO staff has described its intention to use its uniform counting rules as maximum values in RRA showings and that LRA authority to apply counting rules is limited to development of their procurement programs. We also understand that the CAISO staff has clarified that the LRA counting rules have deference and would only be superseded by the CAISO's values if necessary.

Please clarify, with examples if possible:

- What set of facts would create a situation in which it would be “necessary” for the CAISO to supersede an LRA’s counting rules?
- Who would decide whether that situation existed and an override of the LRA were necessary and on what basis would that decision be made?

B. PPC respectfully requests that the CAISO reconsider its apparent decision or preference to not address the deficiencies in the Second Revised Straw Proposal regarding allocation of MIC based on load-ratio share, rather than historical use, and its proposal regarding establishment of a Pre-RA Commitment Date. PPC filed comments on the Second Revised Straw Proposal detailing our concerns regarding the MIC proposal and the Pre-RA commitment date. We continue to object to the proposal in the respects set forth in those comments

We strongly suggest that CAISO, PacifiCorp, and its customers’ representatives should begin to meet to discuss a proposal that is workable for all concerned regarding Pre-RA commitment. To that end we request that the CAISO provide the process that it described in the Second Revised Straw Proposal and recommit to an outcome that preserves existing commercial arrangements and the transmission that makes them possible.