

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the FRACMOO Phase 2 stakeholder initiative Second Revised Draft Framework Proposal posted on April 27, 2018.

Submit comments to [InitiativeComments@CAISO.com](mailto:InitiativeComments@CAISO.com)

**Comments are due May 17, 2018 by 5:00pm**

The Second Revised Draft Framework Proposal posted on April 27, 2018 and the presentation discussed during the May 3, 2018 stakeholder meeting may be found on the [FRACMOO](#) webpage.

Please provide your comments on the Second Revised Draft Framework Proposal topics listed below and any additional comments you wish to provide using this template.

**Identification of ramping and uncertainty needs**

The ISO has identified two drivers of flexible capacity needs: General ramping needs and uncertainty. The ISO also demonstrated how these drivers were related to operational needs.

**Comments:**

[\[insert comments here\]](#)

**Definition of products**

The ISO has outlined the need for three different flexible RA products: Day-ahead load shaping, a 15-minute product, and a 5-minute product.

**Comments:**

[\[insert comments here\]](#)

### **Quantification of the flexible capacity needs**

The ISO has provided data regarding observed levels of imbalances, in addition to previous discussion of net load ramps.

#### **Comments:**

[\[insert comments here\]](#)

### **Eligibility criteria, counting rules, and must offer obligations**

The ISO has identified a preliminary list of resource characteristics and attributes that could be considered for resource eligibility to provide each product. Additionally, the ISO has proposed new EFC counting rules for VERs and storage resources that are willing to provide flexible RA capacity.

#### **Comments:**

[\[insert comments here\]](#)

### **Equitable allocation of flexible capacity needs**

The ISO has proposed a methodology for equitable allocation of flexible capacity requirements. The ISO seeks comments on this proposed methodology as well as any alternative methodologies.

#### **Comments:**

[\[insert comments here\]](#)

### **Next Steps**

The ISO is currently planning to issue a draft final framework on June 6, 2018. However, given the schedule change in the CPUC's RA proceeding, the ISO will not release a draft final framework until July 10, 2018. The ISO seeks stakeholder input regarding next steps that should be taken to further enhance the ISO's framework. Options include, but are not limited to, another full iteration or working groups.

#### **Comments:**

[\[insert comments here\]](#)

### **Other**

Please provide and comments not addressed above, including any comments on process or scope of the FRACMOO2 initiative, here.

**Comments:**

PSE requests that CAISO perform additional analysis around how the FRACMOO proposal impacts the Energy Imbalance Market (EIM), and change the EIM Governing Body classification of the initiative to the extent that the analysis indicates FRACMOO implicates the EIM.