Powerex Comments

Subject: Standard Resource Adequacy Capacity White Paper

| Submitted by | Company | Date Submitted |
|------------------------------|---------------|-------------------|
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Powerex appreciates the CAISO providing this opportunity to comment on the Standard Resource Adequacy Capacity Product White Paper.

Powerex is in general agreement with the proposals in the CAISO's White Paper and appreciates the CAISO clarifying the treatment of non-resource-specific RA imports.

Powerex believes the clarified treatment of non-resource-specific RA imports as a separate distinct RA category is a reasonable approach for the CAISO to take but requests that the CAISO further clarify how the penalties and credits will be calculated for RA imports.

Thank you for the opportunity to provide comments.