

# Stakeholder Comments Template

## Reliability Services Initiative - Phase 2

### Draft Final Proposal

Submitted by	Company	Date Submitted
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This template has been created for submission of stakeholder comments on the draft final proposal for the Reliability Services Initiative - Phase 2 that was posted on January 26, 2015. The draft final proposal and other information related to this initiative may be found at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/ReliabilityServices.aspx>.

Upon completion of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com). Submissions are requested by close of business on **February 26, 2016**.

If you are interested in providing written comments, please organize your comments into one or more of the categories listed below.

In general, SCE is supportive of or at least does not see any issues with the proposals outlined in the RSI 2 Draft Final Proposal. Some additional comments are in the sections below.

1. Clarify Local Regulatory Authority (LRA) interaction and process alignment

SCE can appreciate the benefit of having process alignment between the CAISO and LRAs. SCE is supportive of a process alignment if the CAISO and CPUC can agree on it.

2. Substitution for flexible capacity resources on planned outage

3. Separate local and system RA for purpose of forced outage substitution

While SCE still has concerns regarding the numerous implementation details that will need to be developed for this principle, SCE does not object to the policy developed within this initiative. It seems reasonable to begin separate system and local RA showings.

4. Process to update EFC list during the year

SCE does not have any issue with this since RA AIM implications of EFC changes will be worked through in the CCE Phase 3 initiative.

5. Address the RAAIM exemption currently in place for combined flexible capacity resources

6. Streamlining monthly RA showings

7. Other