

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:

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.

SDG&E understands the process for validation of RA Plans. The ISO, in Portland, noted that it would show a different requirement for a LSE if the LRA had a different PRM value. SDG&E requests the ISO to provide an example of the assessment validation for such a scenario and what the LSE would see in CIRA.

The ISO also provided examples of its processes when RSI 1B is implemented. However, RSI Phase 2 has greater changes that impact the reliability assessment. SDG&E understands that while RSI Phase 2 is still in development, the process detailed by the ISO at the workshop, would be greatly changed and stakeholders would not have a full understanding of the new process after RSI Phase 2. SDG&E recommends the ISO to provide this information to all stakeholders.

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.

SDG&E understands the majority of the ISO's explanation of its CPM cost allocation. However, it is not clear to SDG&E how cost allocation would be assigned if multiple LRAs with multiple PRMs have multiple LSEs that are deficient.

	LRA PRM	CAISO PRM	Peak Forecast	LRA Req	CAISO Req	RA Shown	CPM Allocation?
LSE 1	17%	15%	1000	1170.0	1150.0	1100	
LSE 2	13%	15%	750	847.50	862.50	800	
LSE 3	7%	15%	250	267.50	287.50	275	
			2000	2285	2300	2175	110? 125?

3. Please provide any further feedback your organization would like to provide on the proposed Regional RA reliability assessment process.

SDG&E requests the ISO to provide details on the cost allocation methodology for intra-month CPMs for exceptional dispatch or significant events. Does this methodology differ from that of annual or monthly CPM cost allocation? If so, what are the differences?

4. Please provide any feedback on the other discussions that occurred on the other Regional RA topics during the working group meeting.

SDG&E requests the ISO to also discuss reliability assessment for Flexible RA. Excluding flexible RA requirements from the initiative would not allow all stakeholders to have a full understanding of the Regional RA program.