

Stakeholder Comments Template

Reliability Services Initiative - Phase 2

Draft Final Proposal

Submitted by	Company	Date Submitted
<i>Peter Virasak 408-615-6645 pvirasak@svpower.com</i>	<i>City of Santa Clara, dba. Silicon Valley Power</i>	<i>February 26, 2016</i>

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. 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.

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

No comment at this time.

2. Substitution for flexible capacity resources on planned outage

No comment at this time.

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

SVP requests that the CAISO refrain from creating separate templates to report system and local RA showings. The current template should be revised to have another column (i.e. “Is Local – Y/N”) added to allow entities to specify which transaction is System RA or Local RA.

4. Process to update EFC list during the year

No comment at this time.

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

No comment at this time.

6. Streamlining monthly RA showings

SVP would appreciate the CAISO consider automatically rolling over annual resource supply plans into the monthly showing as well. SVP strongly believes that rolling over the annual

showings to the monthly showings will benefit both LSEs and Resource Owners by eliminating the redundant work and unnecessary penalties associated with a failure to submit plans when there are no changes. That ‘benefit’ should not only apply to Resource Owners in the case where they ‘removed from the monthly RA showing’ as the resource should be fully aware of their intent to remove the supply plan and should be held accountable for the penalties if they do not resubmit by the deadline. Typically, Resource Owners are likely aware of changes to maintenance schedules prior to a compliance showing and would be in communication with their off-taker to determine whether substitute or replacement capacity is required based on the terms outlined in their contracts.

LSEs and Resource Owners typically negotiate and contract for a majority of their RA capacity needs by the annual filing. There are likely a small amount of entities who are looking to fill in their remaining gaps in the monthly process, however; those transactions would result in an adjusted RA plan and supply plan to be submitted anyhow. And generally, quantities transacted in the annual process rarely change for the monthly showings, thus the process today of uploading monthly RA and supply plan showing is essentially a redundant task that SVP would like to do away with. The process should be revised to a ‘manage by exception’ case, and entities should only make revisions in the monthly filings when there is a change.

7. Other