

Stakeholder Comments Template

Submitted by	Company	Date Submitted
Robin Cross, Interim Regional Affairs and Contracts Manager, robin.cross@seattle.gov	Seattle City Light	October 10, 2017

Seattle City Light (Seattle) is the tenth largest consumer owned electric utility in the nation, providing electrical service to more than 415,000 residential, commercial, and industrial customers in the City of Seattle, Washington and six adjacent cities. Seattle owns and operates resources with approximately 2,000 MW of flexible, fast-ramping, hydroelectric capacity. We regularly transact in the wholesale energy and transmission markets. Seattle executed an Implementation Agreement with the California Independent System Operator (CAISO) and intends to begin participating in the Energy Imbalance Market (EIM) in April 2019.

Seattle thanks CAISO for the opportunity to provide comments on its September 26, 2017, Flexible Resource Adequacy Criteria and Must Offer Obligation Working Group Meeting.

Seattle encourages CAISO to take timely action to develop robust flexible capacity market products. We believe that coordination between the Pacific Northwest and California is mutually beneficial to each geographic areas' operational needs in the short-term and the long-term. Therefore, all flexible capacity market products should allow the participation of external resources, provided that any necessary transmission and dynamic transfer capability is available.

Seattle supports further exploration of the CAISO's conceptual proposal to develop multiple dispatchable flexible capacity market products that are differentiated based on the ability of a resource to respond within a specified time. To allow stakeholders to better understand the CAISO's need for these flexible capacity products, the CAISO should publish data that shows its forecast or actual need for each product over the past 12 to 18 months, and the amount of generation capable of providing the service that bid into the market over that same time period.

Seattle is also supportive of long-term solutions and enhancements to resource adequacy requirements as they relate to flexible resources.

Seattle appreciates the opportunity to comment on the operational and reliability challenges CAISO faces in integrating renewable resources. We look forward to further discussing Seattle's ability to provide services from our clean and flexible hydroelectric resources to address these challenges.