

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide written comments on the revised draft final proposal for the Flexible Ramping Product initiative posted on December 17, 2015.

[Please submit comments to initiative@caiso.com](mailto:initiative@caiso.com) by close of business January 12, 2016

The revised draft final proposal is available on the ISO website at:

<http://www.caiso.com/Documents/RevisedDraftFinalProposal-FlexibleRampingProduct-2015.pdf>

Other related materials are available at:

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

Please use the following template to comment on the key topics addressed in the initiative proposal.

1. Overall design
<p>Comment:</p> <p>At this time, and pending review of data from detailed simulations, as discussed in Item 7 below, the Six Cities take no position with respect to the design elements for the Flexible Ramping Product set forth in the Revised Draft Final Proposal.</p>
2. Procurement only in real-time market
<p>Comment:</p> <p>See the Six Cities’ comment in Item 1 above.</p>

3. Settlement of forecasted movement
<p>Comment: See the Six Cities' comment in Item 1 above.</p>
4. Settlement of uncertainty
<p>Comment: See the Six Cities' comment in Item 1 above.</p>
5. Demand curve for uncertainty
<p>Comment: See the Six Cities' comment in Item 1 above.</p>
6. Double payment rules
<p>Comment: See the Six Cities' comment in Item 1 above.</p>
7. Other
<p>Comment: At several stages during the FRP stakeholder process, the Six Cities and other stakeholders have urged the ISO to conduct detailed simulations based on historical market data before implementing any proposed FRP design. The Six Cities remain concerned that the complexities of the proposed FRP design may lead to unintended consequences and unnecessary increases in costs. The Flexible Ramping Constraint currently in place has allowed the ISO to maintain adequate access to ramping capability at reasonable cost, at least within the ISO Balancing Authority Area. It does not make sense to implement a significantly more complex process without confirming through detailed simulations that the additional complexity will be as effective in maintaining reliability and will increase efficiency of market outcomes. The ISO should conduct such simulations, analyze the results, and make such analyses available to market participants before tariff amendments to implement the Flexible Ramping Product become effective.</p>