



Stakeholder Comments Template

Local Resource Adequacy with Availability-Limited Resources and Slow Demand Response Draft Final Proposal

This template has been created for submission of stakeholder comments on the *Local Resource Adequacy with Availability-Limited Resources and Slow Demand Response Draft Final Proposal* that was published on October 2, 2019. The proposal, stakeholder meeting presentation, and other information related to this initiative may be found on the initiative webpage at:

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

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on October 24, 2019.

Submitted by	Organization	Date Submitted
Bonnie Blair 202-585-6905	Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California ("Six Cities")	October 24, 2019

Please provide your organization’s comments on the following topics. When applicable, please indicate your organization’s position on the topics below (Support, Support with caveats, Oppose, or Oppose with caveats). Please explain your rationale and include examples if applicable.

1. Local Assessments with Availability-Limited Resources

- Please provide your organization’s feedback on the *Local Assessments with Availability-Limited Resources* proposal as described in *Section 3*.

Six Cities’ Response: The Six Cities support the CAISO’s proposal to study the impacts of availability limitations on the ability of resources designated for Local RA to respond to dispatch directives and to maintain output levels as needed to sustain local reliability. However, the Draft Final Proposal does not provide a clear description of what action the CAISO will take when the outcome of such a study indicates that the designated Local RA resources are or may not be able to provide sufficient output to maintain reliability. The Six Cities request that the CAISO

provide further detail with respect to the measures it will apply to address any potential deficiency indicated by a Local RA study.

2. Slow Demand Response

- Please provide your organization's feedback on the *Slow Demand Response* proposal as described in *Section 4*.

Six Cities' Response: The Six Cities support the concept of developing a tool to enable pre-contingency dispatch of Slow Demand Response resources subject, of course, to review of the implementation details for the tool.

In summary, please provide your organization's position on the *Local Capacity with Availability-Limited resources and Slow Demand Response Draft Final Proposal*. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats and explain your rationale)

Six Cities' Response: The Six Cities support with caveats (as described in the foregoing comments) the CAISO's proposals discussed in the *Local Capacity with Availability-Limited Resources and Slow Demand Response Draft Final Proposal*