

## Stakeholder Comments Template

### Subject: Regional Resource Adequacy Initiative

Submitted by	Company	Date Submitted
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This template has been created for submission of stakeholder comments on the Revised Straw Proposal for the Regional Resource Adequacy initiative that was posted on April 13, 2016. Upon completion of this template please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com). Submissions are requested by close of business on May 4, 2016.

Please provide feedback on the Regional RA Revised Straw Proposal topics:

#### 1. Load Forecasting

Using a 4% divergence threshold for all LSE's may put smaller entities at a disadvantage over larger ones. Loads in smaller entities can fluctuate more due to weather and specific load characteristics of the LSE. Larger entities can spread fluctuations over their total load better, absorbing and normalizing changes into their load. The ISO should offer some leeway when reviewing small LSE's.

#### 2. Maximum Import Capability

Before determining Maximum Import Capability or Internal RA Transfer Capability Constraints, a stakeholder process must be completed to convert the transmission rights on the PacifiCorp System from a contract path to a flow basis in order to identify currently held rights that will have to be recognized before any allocation process.

#### 3. Internal RA Transfer Capability Constraints

See response to topic #2.

#### 4. Allocating RA Requirements to LRAs/LSEs

No comment.

5. Updating ISO Tariff Language to be More Generic

No comment.

6. Reliability Assessment -  
a. Planning Reserve Margin –

After the stakeholder process identified in our response to Topic 2 is complete and zones are identified based on a flow-based study, UAMPS would recommend that a simplistic/deterministic zonal approach could be initially used to determine PRM for regional integration. In approximately 3 to 5 years, after enough zonal information is gathered, the PRM calculation should change to a probabilistic zonal LOLE approach.

b. Uniform Counting Methodologies –

Solar/Wind: UAMPS recommends the Exceedance methodology.

Storage: UAMPS recommends the Four hour test methodology.

PDR/RDRR/Participating Load: UAMPS recommends the Four hour test methodology.

c. Backstop Procurement Authority –

No comment.

7. Other

No comment.