

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 Third Revised Straw Proposal for the Regional Resource Adequacy initiative that was posted on September 29, 2016. Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **October 27, 2016**.

Please provide feedback on the Regional RA Third Revised Straw Proposal below.

The ISO is especially interested in receiving feedback that indicates if your organization supports particular aspects of the proposal. Alternatively, if your organization does not support particular aspects of the proposal, please indicate why your organization does not support those aspects.

UAMPS COMMENTS

- **The current proposal of having LSE load forecasts submitted in monthly peak load and a coincident peak load formats does not make a lot of difference to UAMPS since our load data base is kept in an hourly format, so our coincident peak load forecast will be based on actual data at the hour of the RISO estimated peak for each month. Nevertheless, we are concerned about the accuracy of the RISO forecast if other LSE forecasts are based on a calculated coincident peak.**
- **UAMPS disagrees with the provision that intra-year forecast changes will only be allowed for load migration due to retail choice. Since in UAMPS service territories there is no retail choice allowed at this time, this provision essentially states that there are no forecast updates allowed. We believe that there are circumstances where an updated load forecast will be needed by the market operator and to minimize pricing risks to LSE's.**

- **For the Peak Demand Forecasts, both coincident and non-coincident, the LSE is required to include transmission losses. We assume that this references the estimated 3% factor in the CAISO OATT, but are unsure. When and how will a RISO-wide transmission loss factor be determined? And does this estimated loss factor cover all transmission, or just the 200 kV and above facilities that will be under the ISO operation? Is there, or will there, be a low voltage loss factor?**

- **For the requirement that all “Non-resource specific contractual obligations for capacity or firm energy delivery must be secured prior to the month-ahead showings are due.”, and the restriction on External Resource Substitution, UAMPS disagrees with both of these provisions. These may restrict our options to serve our load economically in case of nearer term load and or resource changes. The paper states that one reason that CAISO is against implementing this change is that it “would be unduly burdensome to implement the changes at this time”. UAMPS does not understand this reason since it will be multiple years before the Regional ISO is formed and so we believe that there is sufficient time to implement any programming changes.**