

## Stakeholder Comments Template

### Subject: Regional Resource Adequacy Initiative – Working Group, August 10, 2016

Submitted by	Company	Date Submitted
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This template has been created for submission of stakeholder comments on Working Group for the Regional Resource Adequacy initiative that was held on August 10, 2016 and covered the reliability assessment topic. Upon completion of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com). Submissions are requested by close of business on **August 17, 2016**.

Please provide feedback on the August 10 Regional RA Working Group:

- Does your organization clearly understand the examples that were intended to provide explanation of the Regional RA reliability assessment validation of LSE RA Plans and Supply Plans? If not, please indicate what further details or additional clarity your organization believes should be provided by the ISO in the future.
  - Please indicate if your organization believes that there are other specific examples or scenarios that are needed to aid in explaining the Regional RA reliability assessment RA and Supply Plan validations. If so, please detail the specific scenarios that your organization would like the ISO to provide examples on.

**UAMPS believes that more clarity is needed on the current and future criteria of what qualifies as a resource. UAMPS has multiple resources that are currently in our resource portfolio that need to be evaluated on whether they would still qualify under current and future ISO definition of a resource before being able to comment on the details of this proposal.**

- Does your organization clearly understand the examples that were intended to provide explanation of the Regional RA reliability assessment backstop procurement cost

allocation? If not, please indicate what further details or additional clarity your organization believes should be provided by the ISO in the future.

- Please indicate if your organization believes that there are other specific examples or scenarios that are needed to aid in explaining the Regional RA reliability assessment backstop procurement cost allocation. If so, please detail the specific scenarios that your organization would like the ISO to provide examples on.

**UAMPS believes that the ISO should allocate all the costs associated directly to the LSE(s) when backstop procedures are enacted.**

3. Please provide any further feedback your organization would like to provide on the proposed Regional RA reliability assessment process.

**The proposed \$500/day penalty for each day the RA plan is late is inappropriate. If an LSE doesn't provide a plan the ISO should send an email to or call the organization's CEO and as impose a penalty as a very last resort.**

4. Please provide any feedback on the other discussions that occurred on the other Regional RA topics during the working group meeting.

**UAMPS agrees with the calculation on planning reserve margin (PRM), but believes that this calculation should be monitored and adjusted seasonally and yearly to account for adjustments in forecast error, outages, and reserve needs. In the R-ISO the greater diversity of different PTO's could minimize the amount of forecast error. Outages may increase with the aging of gas and coal fleets, and new technology could decrease both forecast and reserve needs. Special consideration should be made so that forecast error, reserves, and outage margins are not double accounted for.**