

## Stakeholder Comments Template

### Flexible Ramping Product Refinements Issue Paper/Straw Proposal

This template has been created for submission of stakeholder comments on the **Flexible Ramping Product (FRP) Refinements issue paper/straw proposal** that was posted on November 14, 2019. Information related to this initiative may be found on the initiative webpage at: <http://www.caiso.com/StakeholderProcesses/Flexible-ramping-product-refinements>.

Upon completion of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com) by close of business on December 5, 2019.

Submitted by	Organization	Date Submitted
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Bonneville appreciates the opportunity to provide comments on CAISO's proposed Flexible Ramping Product (FRP) Refinements.

**1. Proxy demand response eligibility (section 2):**

No comment

**2. Ramp management between fifteen minute market and real-time dispatch (section 3):**

Bonneville supports maintaining a portion of the FRP awards in the buffer interval as this will help ensure available ramping capability in realtime. Bonneville also supports making this change in the BPM vs Tariff.

**3. Minimum FRP requirement for CAISO (section 4):**

Bonneville understands the need and urgency to assure FRP is deliverable within the CAISO BAA and the CAISO's preference to put forward the FRP policy change in the BPM vs the Tariff. Given the absence of details in the 11/14/2019 Straw Proposal and the CAISO's intention to apply the new FRP minimum methodology to all EIM BAA's, Bonneville encourages the

CAISO to allow sufficient time for review and comment on the methodology in this policy initiative prior to releasing draft BPM changes for comment.

**4. Deliverability enhancement (section 5 – 5.2):**

- **Zonal vs. nodal procurement.**

Please provide comments on both pros/cons discussed in the paper.

No comments at this time.

**5. EIM Governing Body classification (section 6.2):**

Given the eventual expansion of the Minimum FRP requirement to all EIM BAAs it may be appropriate for the EIM Governing Body to have primary authority on one or more of these issues. Bonneville encourages the CAISO to determine its classification after the Straw Proposal is advanced further.

**6. Additional comments:**