



Stakeholder Comments Template

Flexible Ramping Product Refinements Initiative

This template has been created for submission of stakeholder comments on the revised straw proposal that was published on March 16, 2020. The proposal and other material related to the Flexible Ramping Product Refinements (FRPR) initiative may be found on the ISO website at: <http://www.caiso.com/StakeholderProcesses/Flexible-ramping-product-refinements>.

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on April 6, 2020.

Submitted by	Organization	Date Submitted
<i>Bonnie Blair</i> 202.585.6905 bblair@thompsoncoburn.com	<i>The Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (the "Six Cities")</i>	<i>April 6, 2020</i>
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Please provide your organization's overall position on the FRPR revised straw proposal:

- Support
- Support w/ caveats
- Oppose
- Oppose w/ caveats
- No position

Please provide written comments on each of the revised straw proposal topics listed below:

1. Proxy Demand Response Eligibility:

- **Six Cities' Comments:** The Six Cities support changing the default dispatchability setting for Proxy Demand Response ("PDR") to 60-minute dispatchable, so as to

require Scheduling Coordinators for PDR resources to affirm that their resource is five-minute dispatchable to be eligible for FRP awards;

2. Ramp Management between fifteen minute market and real-time dispatch:

Six Cities' Comments: The Six Cities support retaining FRP awards in the buffer interval in the Real-Time Unit Commitment Process ("RTUC") that were procured for the previous interval to prevent the release of FRP needed in Real-Time Dispatch ("RTD").

3. Minimum Flexible Ramping Product Requirement for BAA:

Six Cities' Comments: In concept, the Six Cities support CAISO's proposal to procure a minimum quantity of FRP capacity from resources within the CAISO Balancing Authority Area, and the Six Cities do not oppose, at this time, the CAISO's proposed approach for establishing the minimum requirements for internal FRP resources. However, the Six Cities request that the CAISO monitor and continue to evaluate the impacts of the minimum internal FRP requirements going forward to ensure that such requirements do not impose unreasonable or disproportionate burdens on CAISO load.

4. Nodal Procurement:

Six Cities' Comments: The Six Cities support continuing exploration of nodal procurement of FRP, including a robust assessment of the costs of implementing nodal procurement of FRP as compared with the anticipated benefits.

5. FRP Demand Curve and Scarcity Pricing:

Six Cities' Comments: The Six Cities support the concept of graduated scarcity pricing and continued exploration of the application of an FRP Demand Curve to achieve that result.

6. Scaling FRP Requirements:

Six Cities' Comments: The Six Cities take no position on this aspect of the Revised Straw Proposal at this time.

7. EIM Governing Body Categorization – Advisory Role:

Six Cities' Comments: The Six Cities agree with the classification of this initiative for purposes of EIM Governing Body input as recommended in the Revised Straw Proposal.

8. Additional comments:

Six Cities' Comments: The Six Cities generally support the CAISO's objective of enhancing the process for procuring Flexible Ramping Product ("FRP") to ensure that resources receiving FRP awards are capable of responding when they are deployed to provide Flexible Ramping Up and Flexible Ramping Down capacity.