



Stakeholder Comments Template

Hybrid Resources Initiative: Straw Proposal

This template has been created for submission of stakeholder comments on the **Hybrid Resources Initiative, Revised Straw Proposal** that was held on December 17, 2019. The meeting material and other information related to this initiative may be found on the initiative webpage at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/HybridResources.aspx>

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on January 14, 2019.

Submitted by	Organization	Date Submitted
Meg McNaul mmcnaul@thompsoncoburn.com 202.585.6940	Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (the "Six Cities")	June 8, 2020

Please provide your organization's comments on the following topics and indicate your organization's position on the topics below (Support, Support with caveats, Oppose, or Oppose with caveats). Please provide examples and support for your positions in your responses as applicable.

1. Terms and Definitions

Please provide your organization's feedback on the proposed terminology and definitions as described in the revised straw proposal.

The Six Cities do not have comments on this element of the Revised Straw Proposal at this time.

2. Forecasting

Please provide your organization's feedback on the forecasting topic as described in the straw proposal.

The Six Cities do not have comments on this element of the Revised Straw Proposal at this time.

3. Markets and Systems

Please provide your organization's feedback on the markets and systems topic as described in the revised straw proposal.

The Six Cities do not have comments on this element of the Revised Straw Proposal at this time.

4. Ancillary Services

Please provide your organization's feedback on the ancillary services topic as described in the revised straw proposal.

The Six Cities do not have comments on this element of the Revised Straw Proposal at this time.

5. Metering and Telemetry

Please provide your organization's feedback on the metering and telemetry topic as described in the revised straw proposal.

The Six Cities do not have comments on this element of the Revised Straw Proposal at this time.

6. Resource Adequacy

Please provide your organization's position on the Resource Adequacy topic as described in the revised straw proposal.

The Six Cities do not have comments on this element of the Revised Straw Proposal at this time.

Additional comments

Please offer any other feedback your organization would like to provide on the Hybrid Resources Initiative.

The Six Cities have reviewed the comments submitted in this initiative by the California Community Choice Association ("CalCCA") and, specifically, CalCCA's proposal that the CAISO adopt a market dispatch rule for co-located resources that would permit the storage component of a co-located resource to deviate from a dispatch instruction in order to offset a dispatch instruction deviation by the variable energy resource component of the co-located resource. (See CalCCA Comments at 3-4.) The Six Cities concur that such deviations would enable resources to more effectively operate under the co-located configuration while ensuring that the CAISO's dispatch instructions to the co-located resource are respected at the resource's point of interconnection. Use of this dispatch deviation rule should be an option for the

co-located resource to elect to use, rather than a requirement that is mandatory for all co-located resources.