

## Stakeholder Process: Standard Capacity Product Phase II

### Summary of Submitted Comments

Stakeholders submitted five rounds of written comments to the ISO on the following dates:

- Round One, 12/18/09
- Round Two, 02/03/10
- Round Three, 03/04/10
- Round Four, 04/01/10
- Round Five, 04/20/10

Stakeholder comments are posted at: <http://caiso.com/2479/2479e7362d1e0.html>

Other stakeholder efforts include:

- Conference Calls
  - 12/11/09
  - 01/26/10
  - 02/26/10
  - 03/24/10
  - 04/13/10
- California Public Utilities Commission Workshops
  - 12/14/09
  - 01/27/10, 01/28/10

Management Proposal	IOUs	Non-Intermittent Resources	Intermittent Resources	Other	Management Response
Extend SCP to RA Resources whose qualifying capacity is determined by historical output. Apply proportional de-rate methodology considering actual energy delivered.	SCE - Support SDG&E - Support  PG&E – Conditional - support proportional de-rate methodology, but ISO should not consider actual energy delivered	NextEra – Support  Dynegy & Calpine - Conditional - support proportional de-rate methodology, but ISO should not consider actual energy delivered	CAC <sub>2,5</sub> CalWEA/LSA – Oppose the extension of SCP to CHP and intermittent resources.	CPUC – Support	PG&E, Dynegy, Calpine response – While the proportional de-rate methodology accurately accounts of an RA resource’s availability, if the actual energy delivered covers the capacity obligation it should be taken into account.  CAC, CalWEA/LSA response – Management believes that the current proposal provides a reasonable approach for subjecting these resources to availability standards and provides a more equitable application of the rule to all resources.
Clarify SCP Tariff language. (1) Change Section 40.9.6.3 to reflect that allocation of excess funds should be distributed to all metered ISO demand. (2) Update the wording of Section 40.9.4.2 to remove duplicative wording	SDG&E – (1) Oppose - allocation of excess incentive funds should go to default load aggregation points (as currently written) instead of all metered demand.		CAC – (2) Support the removal of the term “non-ambient de-rate” from the types of outages that can be considered in the availability calculation.		SDG&E response - (1) Section 40.1 of the tariff provides that resource adequacy rules are applicable to all load serving entities with the exception of those with a metered peak of less than 1 MW. Thus, Management is proposing this change to ensure consistency with the intention of the original proposal and extend this allocation to all metered ISO demand, not limiting it to the three default load aggregation points.
Defer implementation of rules to replace RA capacity on planned outage to a future stakeholder process.	PG&E – Support SCE – Support	Dynegy – Support NextEra – Support	CalWEA - Support	AReM – Oppose  AReM would like to see rules for replacing RA capacity on planned outage included in the proposal to further facilitate RA contracting and increase the tradability of RA capacity among LSEs.	AReM response – This important element of the RA process will require a comprehensive market design and stakeholder process to adequately address the issue of replacing RA capacity on a planned outage. Management plans to begin this new initiative in the coming months.