

Stakeholder Comments Template

Submitted by	Company	Date Submitted
Barbara R. Barkovich Barkovich & Yap, Inc. Barbara@barkovichandyap.com (707) 937-6203	California Large Energy Consumers Association	February 23, 2016

The California Large Energy Consumers Association (CLECA) provides brief comments on the CAISO's draft final proposal on frequency response. CLECA believes that the CAISO has been responsive to stakeholder comments on the straw proposal, which largely recommended a market-based solution like the development of a frequency response product in the next phase of this process. CLECA also appreciates the CAISO's support for prudent procurement of frequency response for the first phase (i.e. the period beginning December 1, 2016) through enabling of governors, data collection, authority to treat day-ahead procured operating reserve as contingency only in the real-time market and authority for the CAISO to procure transferred frequency response from external BAs. The CAISO proposes to evaluate the offers it received for transferred frequency response in the context of the alternative of committing additional generation on-line through exceptional dispatch. The CAISO's objective should be to acquire the needed capability at the lowest cost and risk to the consumers responsible for the costs.

