

Stakeholder Comments Template

Subject: Regional Resource Adequacy Initiative – Working Group, August 10, 2016

Submitted by	Company	Date Submitted
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This template has been created for submission of stakeholder comments on Working Group for the Regional Resource Adequacy initiative that was held on August 10, 2016 and covered the reliability assessment topic. Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **August 17, 2016**.

Please provide feedback on the August 10 Regional RA Working Group:

1. Does your organization clearly understand the examples that were intended to provide explanation of the Regional RA reliability assessment validation of LSE RA Plans and Supply Plans? If not, please indicate what further details or additional clarity your organization believes should be provided by the ISO in the future.
 - a. Please indicate if your organization believes that there are other specific examples or scenarios that are needed to aid in explaining the Regional RA reliability assessment RA and Supply Plan validations. If so, please detail the specific scenarios that your organization would like the ISO to provide examples on.

Calpine believes that the explanation and examples of the CAISO's reliability assessment in the August 10th working group presentation are generally clear.

2. Does your organization clearly understand the examples that were intended to provide explanation of the Regional RA reliability assessment backstop procurement cost allocation? If not, please indicate what further details or additional clarity your organization believes should be provided by the ISO in the future.
 - a. Please indicate if your organization believes that there are other specific examples or scenarios that are needed to aid in explaining the Regional RA reliability

assessment backstop procurement cost allocation. If so, please detail the specific scenarios that your organization would like the ISO to provide examples on.

Calpine requests clarification of how the CAISO would treat deficiencies that are attributable to differences between the resource counting rules and reliability standards that it plans to use in its reliability assessment and specific LRA counting rules and reliability standards. For example, if the CAISO's reliability assessment is based on a 15% planning reserve margin (PRM) and an LSE whose LRA requires it to procure to a 13% PRM shows resources just sufficient to meet its LRA's PRM, presumably the CAISO would deem the LSE deficient. Would it then require the deficiency to be cured in all circumstances or only in circumstances in which the deficiency results in a cumulative deficiency? To the extent that the CAISO intends the later, Calpine is concerned about the potential for leaning by LSE's subject to less stringent RA requirements on LSEs who show more than sufficient capacity to satisfy CAISO reliability standards, either because they voluntarily show excess capacity or because they are subject to LRA reliability standards that are more stringent than CAISO's.

3. Please provide any further feedback your organization would like to provide on the proposed Regional RA reliability assessment process.

Calpine continues to believe that it is important for the CAISO to enforce uniform reliability across its footprint both with respect to how resources are counted and the reliability level to which load-serving entities are required to procure. Uniform standards are important to maintain reliability and to limit leaning by LSEs subject to less stringent reliability requirements on LSEs subject to more stringent reliability requirements.

4. Please provide any feedback on the other discussions that occurred on the other Regional RA topics during the working group meeting.