

## Stakeholder Comments Template

Submitted by	Company	Date Submitted
<a href="#">Greg Blue</a> <a href="mailto:gregblue@cogentrix.com">gregblue@cogentrix.com</a> (925) 323-3612	<a href="#">Cogentrix Energy Power Management LLC</a>	June 6, 2017

Please use this template to provide your comments on the FRACMOO Phase 2 stakeholder initiative Revised Straw Proposal posted on May 1, 2017.

Submit comments to [InitiativeComments@CAISO.com](mailto:InitiativeComments@CAISO.com)

**Comments are due May 22, 2017 by 5:00pm**

### **Proposal to modify eligibility criteria**

1. Start-up time less than 4.5 hours

**Comments:**

Cogentrix supports tightening the start-up eligibility criteria for resources to qualify to provide flexible capacity. Tightening of the existing standards is consistent with the operational needs of the grid, for which the existing flexible criteria are poorly fit. Although Cogentrix has advocated for tighter start-up time criteria, it has also advocated for urgency. While a longer term, durable definition of flexibility will be required to provide CAISO with the tools it needs to manage reliability on the grid, the need for immediate action justifies this interim step. The selection of 4.5 hours, which is aligned with existing Short-term Unit Commitment function, is actionable and thus a reasonable starting point.

2. Minimum run-time less than 4.5 hours

**Comments:**

As with the start-up time, Cogentrix supports a shorter minimum run-time that is more consistent with current grid operational needs. Long run resources contribute to the over generation challenges facing the California grid, so those resources should be ineligible for providing flexible capacity.

3. Category 3 flexible capacity resources must be available seven day per week

**Comments:**

Cogentrix supports a seven day availability requirement.

**Future considerations**

The ISO identified the following six objectives for long-term RA enhancements:

- 1) Provide for the efficient retention and retirement of resources needed to maintain reliable grid operations by aligning resource adequacy requirements with operational needs;

Cogentrix strongly supports this objective, and encourages the CAISO to further refine its risk of retirement studies and share information about which resource attributes are most needed on the grid. Cogentrix views this as one of the most critical objectives facing the CAISO at present.

- 2) Simplify RA procurement and showing processes through alignment with system and local capacity provisions;

Cogentrix supports this objective.

- 3) Enhance requirements to more closely differentiate particular resource attributes of flexible capacity needed to maintain operational reliability and achieve state policies;

Cogentrix supports this objective, but to the extent that flexible criteria are addressed as Cogentrix has previously outlined in this stakeholder process, does not necessarily favor further differentiation and additional RA products, which would seem counter to the second objective above.

- 4) Align long-term planning and annual RA processes to ensure the long-term planning objectives and assumptions are properly reflected through RA procurement and vice versa;

Cogentrix strongly supports this objective and believes that longer-term visibility and longer-term signals are absolutely critical for proper resource planning decisions to be made.

- 5) Provide opportunities for internal and external resources to qualify to supply flexible capacity if they are able meet the specified requirements; and

Cogentrix supports this objective.

- 6) Solutions should be scalable regardless of number of LSEs or size of LSEs.

Cogentrix supports this objective.

Please provide comments, as appropriate, on these objectives.

**Comments:**

No comments.

Should additional objectives be added?

**Comments:**

No comments.

**Other**

Please provide and comments not addressed above, including any comments on process or scope of the FRACMOO2 initiative, here.

**Comments:**

As stated in numerous comments, Cogentrix has concerns about the urgency of the problems faced by both the operations on the grid and various types of resources on the grid. Cogentrix suggests that the CAISO more clearly define the interim timeframe proposed for the six objectives, and supports interim changes that can be implemented in a manner consistent with the urgency facing the California grid.