

Stakeholder Comments Template

Flexible Resource Adequacy Criteria and Must Offer Obligation - Phase 2 Straw Proposal

Submitted by	Company	Date Submitted
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LSA appreciates the opportunity to provide comments on the FRAC-MOO Phase 2 Straw Proposal and generally supports the approach outlined in the Straw Proposal. LSA commends the CAISO for its continuing efforts to improve both the FRAC-MOO and other markets through design enhancements. As LSA and other stakeholders have suggested previously, in addition to the planned enhancements, we strongly encourage the CAISO to include as part of Phase 2 a more formal assessment of the current program. LSA appreciates that CAISO's continues to conduct studies on forecasted minimum net loads and potential ramping needs; however, these studies need to be complemented by an assessment of how well the current requirements are working in meeting those needs. There may well be other enhancements or adjustments that should be undertaken once those results are analyzed and understood. In addition, as the multiple initiatives outlined in the Straw Proposal proceed, having a periodic update on the overall progress, would greatly aid stakeholders in understanding and assessing the changes underway.

1. Provision of flexible capacity by import or export resources,

LSA strongly supports allowing imports and exports to participate in providing flexible capacity. We have no further comments at this time on the proposed technical requirements for these resources.

2. Flexible capacity from pumped-storage hydro model

No comment at this time.

3. Merchant Variable Energy Resources

LSA supports the CAISO's assessment not to assess merchant VERs a flexibility requirement.

4. Allocating negative contributions to flexible capacity requirements

LSA generally supports this proposed enhancement.

5. Resource adequacy showing requirements for small LSEs

No comment at this time.

6. Other.