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To: Standard Capacity Product Mailbox

Subject: SCPM: Large-Scale Solar Association Comments

The Large-scale Solar Association (LSA) offers these comments on the Draft Final Proposal. LSA represents 11 companies engaged in the development and manufacture of large-scale solar projects, including approximately 4 GWs of solar resources under contract for future deliveries.

LSA appreciates the deferral of the application of availability standards, penalties and incentives for solar pending in the interim. The Draft Final Proposal notes that CAISO will revisit the issue at a later date. LSA encourages the CAISO to coordinate any further review with the CPUC's RA proceeding efforts, ideally in a single forum. LSA notes that the CAISO has forwarded the SCP Draft Final as a proposal for the RA workshops next week.

LSA's interest is in assuring that the full capacity value of solar's energy production is realized and useable by the procuring LSEs for their RA procurement obligation. LSA believes it is important to recognize the value of capacity producing energy in non-peak hours and that such recognition is consistent with the RAR program's goal of assuring supply sufficiency. The current RA program structure, which includes the MCC-based limitations on LSE over-reliance on use-limited resources, is an approach that strikes an appropriate balance between recognizing the capacity value associated these resources and the grid operators' needs for capacity from flexible, dispatchable resources to address dynamic grid conditions.

LSA appreciates this opportunity to comment.

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