

## Stakeholder Comments Template

### Subject: Regional Resource Adequacy Initiative

Submitted by	Company	Date Submitted
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Marin Clean Energy (“MCE”) is a Community Choice Aggregator (“CCA”) that has been providing electricity generation service to customers within Pacific Gas and Electric Company’s (“PG&E”) service territory since 2010. MCE was the first operational CCA in California, and currently provides electric service to over 175,000 retail customers in Marin County, unincorporated Napa County, and the cities of Richmond, San Pablo, El Cerrito, and Benicia. The towns and cities within Napa County, the City of Lafayette, and the City of Walnut Creek have recently joined MCE and are expected to receive MCE service this year. This is expected to increase MCE’s total customer accounts served to approximately 250,000 by late 2016.

Please provide feedback on the Regional RA Straw Proposal topics:

1. Resource Adequacy Unit Outage Substitution Rules for Internal and External Resources

MCE does not have comments on this topic.

2. Discussion of Import Resources that Qualify for RA Purposes

MCE does not have comments on this topic.

3. Load Forecasting

MCE does not object to the ISO’s proposal that all Load Serving Entities (LSEs) provide the ISO with mid-term, one year forward hourly load forecasts, so long as the submission requirement does not exceed once per year. However, MCE is concerned that the long term hourly load forecast may not provide the level of accuracy needed due to the impacts of short term weather variations.

MCE believes it is appropriate to submit monthly load forecast adjustments to reflect load migration. The submission should be based on the LSE’s determination that load forecast

needs adjustment. In the case of CCAs, there is considerable uncertainty in load migration surrounding enrollment periods. CCAs do not know which customers will enroll and which will opt out, and it takes time after enrollment periods end to observe reliable historical usage patterns that will provide the basis for an accurate load forecast.

4. Maximum Import Capability

MCE does not have comments on this topic.

5. Monitoring Locational Resource Adequacy Needs and Procurement Levels

MCE does not have comments on this topic.

6. Allocation of RA Requirements to LRAs/LSEs

MCE does not have comments on this topic.

7. Reliability Assessment

MCE does not have comments on this topic.