California ISO

Reliability Coordinator Rate Design, Terms and Conditions – Final Draft

COMMENTS TEMPLATE

Company	Contact Person	Date Submitted
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Please use this template to provide your written comments on the stakeholder initiative "Reliability Coordinator Rate Design, Terms and Conditions"

Submit comments to initiativecomments@caiso.com

Comments are due July 11, 2018 by 5:00pm

Please identify which topic your question relates to as part of your comments.

Topics include:

General Governance Comments:

- CAISO as RC
    - CAISO should provide status on consideration of alternative RC governance structure. Report on the status of the LLC option that was presented by RPSC.
- Regulatory Construct
- Oversight
- Scope of Services
    - No comment at this time.
- Supplemental Services

- o Existing PTO's should not have to pay for Hosted Advanced Network Application (HANA). CAISO PTO's provide funding for HANA tools associated with the CAISO footprint. The CAISO has proposed that the RC members that want access to these tools will pay $45,000. Current CAISO PTO's have already paid for these tools in the current CAISO footprint; consequently, PTO's should have access to these tools at no cost and potentially be provided a credit since RC members outside the CAISO are paying a portion of the HANA costs.
- Funding Requirement
  - o Greater clarity is needed on the staffing levels for the RC at various membership levels (existing PTO's only up to the maximum staffing level that would support the entire WECC) to provide more transparency on cost.
  - o CAISO should consider a 3rd party assessment of expected staffing levels including benchmarking against existing RCs such as MISO and SPP. The review should include RC staffing levels and schedules for reliability coordinator and operating engineers. The CAISO should feedback their findings to the appropriate RC teams and use this information to validate staffing proposals.
  - o The CAISO needs to ensure that all RC costs are properly accounted and not paid for by the existing PTO's.
- Rate Design
  - o See funding requirement comments
- Settlements Process/Billing
  - o No comment at this time.
- Initial Commitment Terms
  - o No comment at this time.
- Exiting Terms
  - o No comment at this time.
- Service Agreement
  - o No comment at this time.
- Onboarding
  - o No comment at this time
- Other [specify]
  - o CAISO should provide additional information on shared operating engineers between BA and RC functions as it becomes available. Provide details on shift timing for 'shared' periods AND cost allocation between BA and RC.

- CAISO should provide an update on a potential 3rd party audit of the entire RC function prior to going live. This has been suggested by the RPSC.
- CAISO should consider a table top / communication drill prior to going live. This is particularly important because of the expanded RC footprint and functions associated with additional TOP and BA members. Communication protocols with these new members will be important to practice and improve.