

Stakeholder Comments Template

Subject: Regional Resource Adequacy Initiative

Submitted by	Company	Date Submitted
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This template has been created for submission of stakeholder comments to the Second Revised Straw Proposal for the Regional Resource Adequacy initiative that was posted on May 26, 2016. Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **June 15, 2016**.

Please provide feedback on the Regional RA Straw Proposal topics:

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

UAMPS agrees with the proposal of LSE's having the ability and optionality of substituting an internal RA resource with an external RA resource.

2. Discussion of Import Resources that Qualify for RA Purposes

UAMPS supports that an LSE's RA requirement can be met by a variety of options and combinations such as internal generation inside the ISO, external generation imported into the ISO, internal firm contracts, and imported firm contracts. The LRA should determine the amount of import risk the LSE can undertake. The LSE should be able to procure imported firm contracts one month ahead of the delivery date for RA purposes. Firm contracts should use firm resources with firm transmission. Existing external resources of the LSE's should be grandfathered prior to any allocation of import capacity.

3. Load Forecasting

UAMPS encourages the ISO to have a load forecasting working group and additional conversations on the technical issues concerning standardization of load forecasting methodologies.

4. Maximum Import Capability

UAMPS is in favor of open markets and the ability to procure resources throughout the expanded ISO and from external sources.

5. Monitoring Locational Resource Adequacy Needs and Procurement Levels

UAMPS supports the ISO in developing and monitoring locational RA procurement levels with local LRA criteria, but reiterates that PacifiCorp needs to “remap” its system and transmission topology and related transmission users rights to a flow based model. As it stands currently, PacifiCorp operates and allocates rights based on their contract path model and we assume that will have to change with their becoming a PTO. Since there may or may not be changes in users rights with such a change, this has to be done prior to the integration with the CAISO.

6. Allocation of RA Requirements to LRAs/LSEs

UAMPS supports Option 2 of the proposal. Each LRA should have the opportunity to allocate RA requirements to every LSE under its jurisdiction.

7. Reliability Assessment

a. Planning Reserve Margin for Reliability Assessment

UAMPS recommends using a simplistic/deterministic PRM approach until a probabilistic LOLE, 1-in-10 approach, can be finished and finalized for the expanded ISO.

b. Resource Counting Methodologies for Reliability Assessment

UAMPS has no comment.

8. Other

a. Backstop Procurement Authority

There should be an additional step in the process where the deficient LSE meeting the LRA’s criteria can have the chance to explain to the ISO the methodology that was used developing and determining the LSE’s RA forecast. The current process seems one sided. The ISO notifies the LSE of the deficiency. The LSE either cures it or the ISO uses backstop procurement. Costs are then allocated to the deficient LSE. The procedures seem very top down and heavy handed.