

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your written comments on the stakeholder initiative “Capacity Procurement Mechanism Risk-of-Retirement (“CPM ROR”) Process Enhancements.”

Submit comments to InitiativeComments@CAISO.com

Comments are due July 12, 2017 by 5:00pm

The Straw Proposal posted on June 20, 2017 and the presentations discussed during the June 27, 2017 stakeholder conference call can be found on the [CPM ROR](#) webpage.

Please use this template to provide your written comments on the straw proposal topics listed below and any additional comments that you wish to provide.

About the Western Power Trading Forum

The Western Power Trading Forum (WPTF) is a California nonprofit, public benefit corporation. It is a broad-based membership organization dedicated to enhancing competition in Western electric markets while maintaining the current high level of system reliability. WPTF supports uniform rules and transparency in order to facilitate transactions among market participants. The membership of WPTF includes load serving entities, energy service providers, scheduling coordinators, generators, power marketers, financial institutions, and public utilities, all of

which participate actively in the California market and other such markets in the West and across the country.¹

WPTF appreciates the opportunity to provide comments on the Capacity Procurement Mechanism Risk-of-Retirement (CPM ROR) Process Enhancements Straw Proposal posted on June 20, 2017 and the stakeholder call on June 27, 2017.

1. Who can apply

Comments:

WPTF strongly supports this element of the proposal and appreciates that the CAISO has made this change. Enabling resources currently under RA contracts the flexibility to seek CPR ROR in future planning periods provides some much-needed certainty.

2. Timing

Comments:

WPTF supports the CAISO's proposal on the timing of the process with the caveats noted in sections 3 and 5 below.

3. Application Requirements

Comments:

WPTF supports the change in the application submission timing from 180 to 90 days.

As part of the general application requirements, WPTF notes that the proposed new Tariff provisions stating that a resource that has received a CPM ROR designation need not retire should include the circumstance not only if the resource has been sold to a non-affiliated entity but also if the resource is *in the process of such a sale*. This is reflective of the fact that resource sales are time-intensive activities and may not neatly fit into the timeline defined in this proposal.

While WPTF supports the intent of having two application windows, the current Straw Proposal's description of the April window is onerous and unworkable. We believe it would be better to leave this entire element out of the proposal for the sake of expediency and simplicity. The RMR process can serve the need the April window is proposed to address without adding unneeded complexity.

¹ A member list can be found [here](#) and these comments do not necessarily represent individual member views.

4. Selection Criteria when there are Competing Resources

Comments:

WPTF support the proposed selection criteria in the case of competing resources.

5. Term and Monthly Payment Amount

Comments:

WPTF supports the Term and Monthly Payment Amount with the key clarification that resources will receive compensation for all months of the calendar year of their CPM designation in which they do not have an RA contract. To provide an example, this means that if a resource does not receive a CPM designation until February 2018, and is not RA in January 2018 the resource owner will receive “back pay” for the CPM for the month of January 2018. WPTF believes this is the CAISO’s intended proposal, but requests that this point be made clear in the next iteration of the policy process.

6. Cost Justification

Comments:

WPTF supports the Cost Justification proposal.

7. Decision to Accept

Comments:

WPTF supports the continuance of the policy that acceptance of CPM designations be voluntary.

8. Other Comments

Please provide any additional comments not associated with the topics listed above.

Comments:

WPTF commends the CAISO for its efforts to develop incremental improvements and simplifications to the CPM ROR process on an expedited basis.

Thank you for your consideration of these comments.