

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the FRACMOO Phase 2 stakeholder initiative Revised Draft Framework Proposal posted on January 31, 2018.

Submit comments to InitiativeComments@CAISO.com

[Comments are due February 21, 2018 by 5:00pm](#)

The Revised Draft Framework Proposal posted on January 31, 2018 and the presentation discussed during the February 7, 2018 stakeholder web conference may be found on the [FRACMOO](#) webpage.

Please provide your comments on the Revised Draft Framework Proposal topics listed below and any additional comments you wish to provide using this template.

The ISO is in the process of updating the data provided in the Revised Draft Framework Proposal. The ISO will include additional observations for 2016 and 2017. Additionally, the ISO will estimate the impacts of 15-minute IFM scheduling. The ISO will release this updated analysis as soon as possible.

Identification of ramping and uncertainty needs

The ISO has identified two drivers of flexible capacity needs: General Ramping needs and uncertainty. The ISO also demonstrated how these drivers related to operational needs.

Comments:

[CDWR has no comments at this time.](#)

Definition of products

The ISO has outlined the need for three different flexible RA products: Day-ahead load shaping, a 15-minute product, and a 5-minute product.

Comments:

CDWR believes that much depends on the parameters of the products and who can provide them.

Quantification of the flexible capacity needs

The ISO has provided data regarding observed levels of uncertainty, in addition to previous discussions of net load ramps.

Comments:

CDWR does not have comments at this time.

Eligibility criteria and must offer obligations

The ISO has identified a preliminary list of resource characteristics and attributes that could be considered for resource eligibility to provide each product. Additionally, the ISO is considering new counting rules for VERs that are willing to bid into the ISO markets.

Comments:

Further study may be needed on whether resources providing a Day Ahead Load Shaping product need to be offered 24 hours 7 days a week or not. Too stringent of a must offer obligation requirement (MOO) may prevent suitable resources from providing the needed flexible capacity.

The details on how the resource adequacy availability incentive mechanism (RAAIM) will be applied still need to be developed. Currently RAAIM is based on the MOO hours. If the MOO is a 24 hour by 7 days a week requirement, and RAAIM continues to be based on the MOO requirement, it may result in unintended penalties, such as for a Day Ahead Load Shaping product.

Equitable allocation of flexible capacity needs

The ISO has proposed a methodology for equitable allocation of flexible capacity requirements. The ISO seeks comments on this proposed methodology, as well as any alternative methodologies.

Comments:

CDWR supports the proposal to use an allocation methodology for the Day Ahead Load Shaping (DALs) product similar to the existing methodology for allocating flexible capacity. However, details should be discussed further.

Other

Please provide any comments not addressed above, including comments on process or scope of the FRACMOO2 initiative, here.

Comments:

CDWR does not have a comment at this time.

