

## 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](mailto: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:**

[See the Council's December 13, 2017 Comments on this issue.](#)

**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:**

The Council does not have any additional comments on the product definition at this time.

**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:**

The Council does not have additional comments on the data CAISO provided.

**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:**

The Council greatly appreciates CAISO's changes to the Revised Draft to address the concern we raised regarding the CPUC's requirement that flexible resource adequacy must include flexible attributes as well as meet system resource adequacy capacity requirements. As we pointed out in earlier comments, requiring the bundling of system and flexible requirements and obligations in one resource is a significant barrier for demand response resources.

CAISO's proposal to modify its existing EFC eligibility to include a flexible capacity deliverability study is a significant step in the right direction. CAISO indicated that the addition of a separate EFC deliverability study means that NQC and EFC can be reasonably and reliably unbundled, allowing a resource to have one without the other or both with values that are not equal. The Council encourages CAISO to introduce this proposal into the record in the resource adequacy proceeding at the CPUC so that the CPUC's requirement can also be unbundled.

**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:**

The Council does not have comments on this section of the proposal at this time.

**Other**

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

**Comments:**

[insert comments here]