

TO: CAISO

RE: Reliability Services Tariff and Agreement

FROM: Public Interest Organizations: NW Energy Coalition, Natural Resources Defense Council, and Western Grid Group

DATE: August 10, 2018

We appreciate the opportunity to comment on the draft Tariff language and the Reliability Services Agreement. We also note the CAISO provides an open and accessible stakeholder process as with the creation of the Energy Imbalance Market, the Green House Gas Emissions work, Resource Adequacy and many more grid services.

We support the CAISO becoming a Reliability Coordinator (RC) in the Western Interconnection; however, we would like to see some changes to the proposed oversight and notification of Reliability Coordinator services that reflect more of the inclusive communications of the CAISO. The Reliability Coordinator is the “highest operating authority; the underlying premise is that reliability of a wide-area takes precedence over reliability of any single local area. Only the RC has the perspective/vision necessary to act in the interest of wide-area reliability.”¹ And since the RC plays such an important role, oversight should include transparent budget discussions, open meetings to discuss tools, creation and establishment of metrics, and so forth. As noted in our public interest letter (see attached), our primary goals are to achieve a reliable, modern, and low carbon Western electricity grid that can accommodate the many technological, policy, and market-based changes that are rapidly occurring in our region.

As an RC, the CAISO will develop and implement new tools and analyses that enable the unique capabilities to improve grid reliability. When the RC provides these tools and models, it is critical to include input from interested stakeholders. And so, in our comments, we note where meetings and documents should be public, as well as inclusive committees with public interest organizations, states and consumers created to ensure a reliable grid.

The other Reliability Coordinators in North America maintain public access to key documents and provide forums such as advisory committees for members other than Transmission Owners, Operators and Balancing Authorities as to provide unique insight and perspectives. As the Texas Regional Entity states, “A key function of Reliability Services is to facilitate the exchange of information and dialogue among stakeholders to promote a culture of reliability excellence.”²

¹ NERC Reliability Functional Model Technical Document- Version 5

² <https://www.texasre.org/Pages/reliability.aspx>

We encourage the CAISO to create an independent and transparent Oversight Committee.

Thank you for the opportunity to comment and we look forward to working with you.

Sincerely,

Julia Prochnik

Director of Western Renewable Grid Planning

Natural Resources Defense Council

Kate Maracas

Director

Western Grid Group

Fred Heutte

Senior Policy Associate

NW Energy Coalition