

Reliability Coordinator Services

Rate Design, Terms and Conditions Straw Proposal

COMMENTS TEMPLATE

Company	Contact Person	Date Submitted
The Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (the “Six Cities”)	Meg McNaul mmcnaul@thompsoncoburn.com 202.585.6940 Bonnie Blair bblair@thompsoncoburn.com 202.585.6905	May 4, 2018

Please use this template to provide your written comments on the stakeholder initiative
 “Reliability Coordinator Services Rate Design, Terms and Conditions”

Submit comments to initiativecomments@caiso.com

Comments are due May 4, 2018 by end of day

The straw proposal that was posted on April 5, 2018 and the presentation discussed during the April 12, 2018 stakeholder meeting can be found on the following webpage:
http://www.caiso.com/informed/Pages/StakeholderProcesses/ReliabilityCoordinatorServicesRateDesignTerms_Conditions.aspx

Please identify which topic your question relates to as part of your comments.

Topics include:

- Scope of Services
- Supplemental Services
- Funding Requirement

- Rate Design
- Settlements Process
- Initial Commitment Terms
- Exiting Terms
- Service Agreements
- Onboarding
- Other [specify]

Comment: Scope of Services – The Six Cities have a general comment with respect to the CAISO’s proposal to provide Reliability Coordinator (“RC”) services within the CAISO Balancing Authority Area, as well as external to the CAISO. Based on information provided during the regional information sessions held earlier this year as well as in the Straw Proposal and the associated stakeholder meeting, the Six Cities observe that much of the focus on initial implementation of the CAISO’s RC services is understandably on coordination as between the RC and Balancing Authorities and Transmission Operators located within the future RC footprint. The Six Cities urge the CAISO, as it moves forward, to ensure that registered entities in other functional categories, such as Distribution Providers, Transmission Owners, Generator Owner/Operators, and Resource Planners, are kept apprised of any developments that may impact their compliance with and documentation for applicable Reliability Standards. For example, if there are relevant changes to the CAISO’s procedures for issuance of Operating Instructions to Generator Operators or Distribution Providers (as contemplated under Reliability Standard IRO-001-4) as a result of the CAISO assuming the role of the RC, those changes should be clearly communicated to relevant entities so that their procedures can be revised if necessary. Similarly, if the CAISO, in its capacity as the Reliability Coordinator, will require registered entities to provide additional or new information in the data specification developed under Reliability Standard IRO-010, that should likewise be clearly communicated to the relevant registered entities.

These Reliability Standards are examples of where the Reliability Coordinator may interface, either directly or indirectly, with registered entities other than Balancing Authorities and Transmission Operators. The CAISO should consider these and any other Reliability Standards where potential changes in compliance procedures, documentation, or other information may be appropriate and ensure that registered entities are aware of and have the opportunity to provide input on any modified obligations.

Comment: Other – The Six Cities also ask that the CAISO clarify what tariff revisions the CAISO currently intends to file at FERC with respect to its provision of RC services.

The CAISO has noted potential revisions to the existing compliance penalty provisions (see Straw Proposal at 12), and it appears that the CAISO currently may intend that the RC rate design will be included in the tariff. Has the CAISO identified other tariff revisions related to these services that are needed?