

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	May 10, 2018
SUPPLEMENTAL COMMENTS	Bonnie Blair bblair@thompsoncoburn.com 202.585.6905	

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: The comments set forth below supplement the Six Cities' initial comments on the Straw Proposal in this initiative, originally submitted on May 4, 2018, and address two additional discrete points relating to the CAISO's proposal to provide Reliability Coordinator services.

Supplemental Services – The Six Cities request further clarification from the CAISO regarding its proposal to provide certain supplemental services, including the “Hosted Advanced Applications.” Specifically, stakeholders would benefit from further explanation from the CAISO regarding how it will determine which services to provide and to whom those services will be available. What will be the funding source for initial development of those services? Relatedly, how will the CAISO ensure that only the parties who have a need and agree to pay for those services are assessed the costs of those services?

Other – The Six Cities also ask that the CAISO provide (i) a comparison between the CAISO and Peak Reliability budgets (including the basis for the claimed reduction in costs relative to Peak Reliability); and (ii) a comparison of the organizational structure of Peak Reliability and the CAISO. Relatedly, the Six Cities request additional information regarding the CAISO's intended approach for oversight and governance of the Reliability Coordinator function. The Six Cities are aware that the CAISO engaged in some stakeholder outreach through several regional forums earlier this year, and to the extent that any of the Cities' questions on oversight and governance were previously addressed there (or elsewhere), the CAISO could direct the Cities and other stakeholders accordingly.