

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.

WPTF continues to support the CAISO proposed flexible RA framework, but cannot support the specific proposal without modifications. At this time the CAISO's specific proposal fails to demonstrate that the proposed flexible requirements will be meaningful once the CAISO implements its day-ahead fifteen minute market. It also fail to demonstrate the connection between the flexible products eligibility requirements and operational need. It is WPTF's view that if an RA requirement is solely an administrative exercise and does not change LSE showings nor LSE procurement, then it is not a worthwhile requirement.

That said, WPTF believes the CAISO's framework is solid and that the CAISO should move forward with basing the flexible RA market design on the connection with energy market needs, including accounting for real-time uncertainty. WPTF would support the CAISO's proposal if it

can be modified to the extent the CAISO can demonstrate that all flexible RA products are meaningful and that the requirements will not overly burden small Load Serving Entities (LSEs), including new Community Choice Aggregators (CCAs).

WPTF is unsure that the CAISO will be able to develop such a proposal prior to the finalization of the day-ahead market enhancements. The new fifteen-minute day-ahead market, the combining of RUC and IFM, and the ramping ancillary service product will inevitably change the feasibility and need of the CAISO's flexible RA program. That said, WPTF believes that the CAISO has demonstrated an immediate need for additional fast-ramping capability in real-time.

In the CPUC RA Proceeding, Cogentrix put forth a transitional "fast-flexible" proposal. WPTF supports the CAISO evaluating whether these ideas have merit for the 2019 RA year and until a durable flexible product can be put in place. WPTF does not support the proposal *carte blanche*, but believes that parts of the proposal may be a reasonable interim compromise that is worth exploring.

In addition to this proposal, WPTF supports the CAISO's continuing to evaluate (1) how imports can qualify as flexible RA; (2) whether to fully unbundle the flexible RA program from local and system RA requirements; and (3) allowing resources such as energy storage receive the full value of their effective flexible capacity for both ramping up and ramping down services.

Thank you for the consideration of these comments.