



Stakeholder Comments Template

RA Enhancements

This template has been created for submission of stakeholder comments on the straw proposal part two that was published on February 28. The paper, Stakeholder meeting presentation, and other information related to this initiative may be found on the initiative webpage at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/ResourceAdequacyEnhancements.aspx>

Upon completion of this template, please submit it to initiativecomments@caiso.com.

Submissions are requested by close of business on March 20.

Submitted by	Organization	Date Submitted
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Please provide your organization's comments on the following issues and questions.

1. Review of counting rules in other ISO/RTO's

Please provide your organization's feedback on this topic, described in Section 4.1. Please explain your rationale and include examples if applicable.

Boston Energy has no comments at this time.

2. Capacity counting and availability best practices

Please provide your organization's feedback on this topic, described in section 4.2. Please explain your rationale and include examples if applicable.

Boston Energy supports the ISO in removing the performance requirements to its existing RAIM structure from its straw proposal. Boston Energy does not object to the ISO looking at resource level forced outage rates, but as expressed further the proposal needs to clearly state how that value will be used and what are the expectations for RA suppliers as far as reporting and availability. We further feel that alignment between the CPUC and CAISO counting approaches are a prerequisite for making any changes to the current structure.

3. RA counting rules and assessment enhancements

Please provide your organization's feedback on the following sub-section topics, described in section 4.3.

Please indicate any analysis and data review that your organization believes would be helpful to review on the this topic. Please provide details and explain your rationale for the type of data and analysis that you suggest.

- a. Calculating NQC, UCAP, and EFC values topic, described in section 4.3.1.

Boston Energy asks the ISO clarify how NQC, UCAP, and EFC will be calculated for non-renewable resources whose NQC is not based on a pmax test but rather based on adjustments for historical net output. For example, Combined Heat and Power (CHP) units can have a pmax that is above its stated NQC/EFC due to host load requirements and how the ISO models the resource in the market. In particular, Boston Energy asks the ISO to provide clarity on how all these changes will impact sresources operating under a net-scheduling PGA.

Further, If the ISO ultimately does move to a UCAP approach and that value is used internally to determine shortfalls in the RA plans then we ask the ISO to expand upon the rules for allowing forced outages to transition to planned. If CAISO doesn't allow longer term forced outages to transition to a planned state, then the ISO should consider creating a new forced outage type that wouldn't impact a resources EFORD. Such an approach is used in the NYISO market and has corresponding rules for providing capacity while in this type of outage condition.

- b. Determining System, Local, and Flexible RA requirements topic, described in section 4.3.2. Please explain your rationale and include examples if applicable.

Boston Energy has no comments at this time.

- c. RA showings, supply plans, and assessments topic, described in section 4.3.3. Please explain your rationale and include examples if applicable.

Consistent with comments in section 3.a Boston Energy asks the ISO to expand upon the Must Offer Obligation (MOO) rules for resources whose NQC is not solely based on pmax.

Also, while not discussed in the part 2 paper Boston Energy feels strongly that the ISO should consider developing a formal location on its website where resources could post available RA that that is eligible up for substitute capacity. This "bulletin board" could help a resource determine whether to take advantage of the the proposed CSP process for planned outage substitution. Given the likely timing crunch a CSP POSO process will be under and additional information available to suppliers as to who might a substitute capacity available will be beneficial to all.

- d. Backstop capacity procurement topic, described in section 4.3.4. Please explain your rationale and include examples if applicable.

Boston Energy has no comments at this time.

4. Review of RA import capability provisions

Please provide your organization's feedback on the following sub-section topics, described in section 4.4.

Please indicate any analysis and data review that your organization believes would be helpful to review on the this topic. Please provide details and explain your rationale for the type of data and analysis that you suggest.

- a. Maximum Import Capability Calculation review, described in section 4.4.1. Please explain your rationale and include examples if applicable.

Boston Energy asks that the CAISO provide additional information and analysis on the MIC process at the intertie level. Boston Energy would like the ISO to clarify the process for allocating MIC to non Load Serving Entities. If no process exists we ask the ISO to expand upon why, and consider incorporating a way for non-load serving entities to obtain MIC at a given intertie.

b. Available Import Capability Allocation Process review, described in section 4.4.2. Please explain your rationale and include examples if applicable.

Boston Energy has no additional comments at this time.

Additional comments

Please offer any other feedback your organization would like to provide on the RA Enhancements straw proposal – part two.