



## Stakeholder Comments Template

### Resource Adequacy Enhancements – Straw Proposal Part 1

Upon completion of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com). Submissions are requested by close of business on February 6, 2019.

Submitted by	Organization	Date Submitted
<i>Mark Miller 503 230-4003</i>	<i>Bonneville Power Administration</i>	<i>February 6, 2019</i>

Bonneville Power Administration (Bonneville) appreciates the opportunity to submit comments on CAISO's Resource Adequacy Enhancements Straw Proposal – Part 1. Bonneville looks forward to seeing and providing comment on the full proposal for Resource Adequacy Enhancements.

Bonneville is a federal power marketing administration within the U.S. Department of Energy that markets electric power from 31 federal hydroelectric projects and some non-federal projects in the Pacific Northwest with a nameplate capacity of 22,500 MW. Bonneville currently supplies 30 percent of the power consumed in the Northwest. Bonneville also operates 15,000 miles of high voltage transmission that interconnects most of the other transmission systems in the Northwest with Canada and California. Bonneville is obligated by statute to serve Northwest municipalities, public utility districts, cooperatives and then other regional entities prior to selling power out of the region.

#### 1. Rules for Import RA

Bonneville appreciates the need to assess and revise the Resource Adequacy (RA) framework and supports the CAISO in addressing the issues of speculative supply and double counting of RA imports through a framework that ensures all RA resources have the physical capacity to be able to deliver when called upon by the CAISO.

Bonneville is concerned that identifying the BAA or resource specific information does not fully meet the objective of ensuring there is no double counting. Just knowing what BAA a resource is located within or knowing the specific resource does not necessarily inform whether that capacity is actually available or not. Perhaps the CAISO should include an attestation that the Resource Adequacy capacity is not and will not be sold to a third party.

If the CAISO has a way to use BAA information to limit double counting of resources then Bonneville supports the identification of the source Balancing Authority for all RA

resources at time of the RA submittal. Additionally, Bonneville would support resource specific identifications as long as the resources specific identifications are consistent with resources defined within the Master Files (including aggregated resources).

Bonneville supports extending the must offer obligation for RA imports into the real-time markets. This would help ensure California has access to resources through real-time to maintain reliability, not just through the day-ahead time-period.

## **2. RAIM Enhancements & Outage Rules**

Bonneville supports the CAISO's proposal to include both a performance assessment and an availability assessment. Bonneville believes if a resource is secured for purposes of RA, that resource should be available to the CAISO in all of the hours the resource was contracted for. Bonneville supports the CAISO retaining an availability assessment and including in that assessment a random check of availability instead of, or in addition to, only checking during a defined period.

Bonneville supports the CAISO in evaluating its existing availability and outage rules to determine if there are additional incentives needed to ensure that resources are made available and perform when needed to maintain reliability within California.

BPA supports using the same timeframe for assessing MOO, availability, and performance, e.g. 24 x 7 in all cases.