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Sent: Friday, December 20, 2013 6:56 AM

To: Meeusen, Karl

Cc: Rader, Nancy

Subject: RE: Flexible Resource Adequacy Criteria and Must-Offer Obligation Working Group 12/13/13

Hello Karl,

Are you expecting "formal" written comments based on our FRAMOO working group meeting ("FRACMOO workshop") last week?

In any case, I would like to re-emphasize the points that CalWEA made at the FRACMOO workshop last week:

1. Flexible capacity requirement allocation to LSEs should be "causation" based and calculated using the individual LSEs' share of the biggest monthly net load ramp – the one that determines the total Flexible capacity requirement for the month. However, if due to the desire to have more stable allocators as raised by SCE, CAISO may want to average LSE's net load ramp contributions for the 5 largest net load ramps in the month (rather than using a single net load ramp event as we have been advocating) for allocating monthly flexible capacity requirement among LSEs.
2. The net load ramp contribution of LSEs' distributed resources should be explicitly calculated and accounted for in the allocation of the Flexible Capacity requirement allocation. And this calculation should be based on the forecasted distributed generation which would account for the explosive growth in distributed generation capacity in the CAISO footprint.
3. Fixed schedules contribute to net load ramp and as such should be explicitly accounted for in the allocation of monthly flexible capacity requirement.

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