

# Flexible Ramping Product – Revised Draft Final Proposal

Submitted by	Company	Date Submitted
Alex J. Morris	California Energy Storage Alliance (CESA)	January 12, 2016

The California Energy Storage Alliance (CESA) offers these brief comments on the Flexible Ramping Product Revised Draft Final Proposal.<sup>1</sup> CESA appreciates the CAISO’s consideration and work on this matter.

Building on CESA’s earlier comments, CESA supports the rapid approval and implementation of the Revised Draft Final design. It is very important to replace the current flexible ramping constraint with the product, which will provide superior operations and market efficiency, via downward ramping capabilities and many more sophisticated operational features, including procurement approaches, cost-allocation, and better ramping dispatch continuity between the 15-minute and 5-minute markets. For flexible resources, this is a significant enhancement to the CAISO’s current market.

Further reviews by stakeholders are unlikely to yield more than minor tweaks to the design at this point, and given the improvements of the product over the constraint as well as the lengthy and thorough stakeholder process undertaken by the CAISO, further delay in implementing the product seems unreasonable and unwarranted. The CAISO and stakeholders can also track the performance of the product, once implemented, through the CAISO’s well established and rigorous market performance and monitoring safeguards, including through reports and oversights by the Department of Market Monitoring (where applicable) and through the regularly scheduled Market Performance and Planning Forum. These safeguarding features of the CAISO’s market should ensure stakeholders that any potentially unexpected as well as unlikely issues with the product can be noted and corrected.

---

<sup>1</sup> <http://www.aiso.com/Documents/RevisedDraftFinalProposal-FlexibleRampingProduct-2015.pdf>