

Resource Adequacy Modeling and Program Design (RAMPD) Initiative

Track 3A: Resource Visibility

Stakeholder comment summary

October 2025

Stakeholder Name	Stakeholder Comment Summary	ISO Response
Alliance for Retail Energy Market (AreM)	Supports the ISO's goal of increasing visibility and the capacity status category definitions. AReM advocates for making an aggregated version of the information collected through the reporting available to the public. AReM opposes retirement of the Non-RA Capacity Report on the basis of insufficient justification.	The ISO intends to publish an aggregated version of the collected information. The ISO has not found significant evidence of the Non-RA Capacity Report being used and providing value.
California Community Choice Association	Supports the ISO's goal of increasing visibility and the capacity status category definitions. CalCCA advocates for making an aggregated version of the information collected through the reporting available to the public.	The ISO intends to publish an aggregated version of the collected information.
California Department of Water Resources	Supports the ISO's goal of increasing visibility and the proposal as written. CDWR emphasizes the importance of the reporting not imposing any new availability requirements on the capacity being reported on.	The ISO clarified that the proposed reporting requirements will not impose any availability requirements on the capacity being reported on.
California ISO – Department of Market Monitoring	Supports the ISO's proposal. DMM notes that resource adequacy deficiencies requiring the use of the capacity procurement mechanism (CPM) have not happened recently, but emphasizes the value for reliability of effective CPM functioning when such deficiencies arise.	The ISO agrees that backstop procurement in an efficient and effective manner is an important part of the ISO's role in maintaining grid reliability.
Microsoft	Supports the ISO's proposal. Microsoft advocates for making an aggregated version of the information collected through the reporting available to the public.	The ISO intends to publish an aggregated version of the collected information.

Middle River Power, LLC	Does not support the ISO's proposal on the grounds of the administrative burden the reporting requirements will impose on scheduling coordinators. MRP advocates that the ISO adopt the capacity transaction tracking system MRP proposed at a stakeholder meeting in February 2025. MRP also opposes retirement of the Non-RA Capacity report.	The ISO finds the proposed reporting requirements an appropriate balance between increasing the ISO's visibility into capacity status and minimizing administrative burden for scheduling coordinators. The ISO will consider additional changes to its backstop procurement processes in Track 3B of this policy initiative. The ISO has not found significant evidence of the Non-RA Capacity Report being used and providing value and intends to publish an aggregated version of the collected information to add transparency.
Pacific Gas & Electric	Supports the ISO's goal of increasing visibility. PG&E is willing to accept the proposed reporting requirements as a balance between improving visibility for the ISO and minimizing administrative burden for scheduling coordinators. PG&E encourages the ISO to reconsider retirement of the Non-RA Capacity Report.	The ISO has not found significant evidence of the Non-RA Capacity Report being used and providing value and intends to publish an aggregated version of the collected information to add transparency.
San Diego Gas & Electric	Supports the ISO's goal of increasing visibility but expressed concerns about the administrative burden of complying with the reporting requirements. SDG&E advocates consolidating the proposed five capacity categories into three.	The ISO finds the proposed reporting requirements an appropriate balance between increasing the ISO's visibility into capacity status and minimizing administrative burden for scheduling coordinators. The ISO's proposal clarifies that in the annual process if sufficient information is not available fewer categories may be used.
Southern California Edison	Supports the ISO's proposal.	SCE's support is appreciated.
Western Power Trading Forum	Supports the ISO's goal of increasing visibility. WPTF advocates for making an aggregated version of the information collected through the reporting available to the public.	The ISO intends to publish an aggregated version of the collected information.