

Stakeholder Comments Template

Submitted by	Company	Date Submitted
Steven Kelly Policy Director	Independent Energy Producers Assoc (IEP)	April 10, 2018

Please use this template to provide your written comments on the stakeholder initiative
“Review of RMR and CPM.”

Submit comments to initiativecomments@caiso.com

Comments are due April 10, 2018 by 5:00pm

The Draft Final Proposal for Phase 1 Items and Items under Consideration for Phase 2 that was posted on March 13, 2018 and the presentation discussed during the March 20, 2018 stakeholder meeting can be found on the following webpage:

http://www.caiso.com/informed/Pages/StakeholderProcesses/Review_ReliabilityMust-Run_CapacityProcurementMechanism.aspx.

Please use this template to provide your written comments on the items listed below and any additional comments that you wish to provide.

1. Comments on phase 1 draft final proposal to make RMR units subject to a must-offer obligation.

Please indicate whether you support the draft final proposal. If you oppose the draft final proposal, please indicate the reasons for your opposition.

Comments: IEP opposes the proposal to make RMR units subject to a must-offer obligation (MOO) in the absence of a more thorough assessment of the potential impact of such change on CAISO markets and market-clearing-prices. IEP recommends that the Department of Market

Monitoring (DMM) conduct an assessment of the market implications of the proposed changes as a *pre-condition* for the CAISO management filing new tariff language implementing the MOO on RMR Condition 2 units.

CAISO management should commit to studying the market implications of this matter prior to submitting tariff language to FERC. IEP believes that a DMM market assessment could be released to stakeholders no later than May 30, 2018. As a result, the DMM market assessment will inform but not impede nor unreasonably delay the filing of new tariff language imposing a MOO on Condition 2 units (assuming the RMR Condition 2 Unite MOO proposal does not impact CAISO markets).

2. Comments on phase 1 draft final proposal for ISO to provide notification to stakeholders that a resource is planning to retire.

Please indicate whether you support the draft final proposal. If you oppose the draft final proposal, please indicate the reasons for your opposition.

Comments: [\[Insert comments here\]](#)

3. Comments on potential phase 2 items.

Section 8 of the March 13, 2018 paper discusses the items that may be candidates for phase 2 of this initiative. It includes items suggested by both the ISO and stakeholders. The ISO requests that stakeholders comment on the priorities for these potential phase 2 items.

Comments: [\[Insert comments here\]](#)

4. Other Comments

Please provide any additional comments not associated with the items listed above.

Comments: [\[Insert comments here\]](#)