



October 23, 2025

California Independent System Operator Corporation Board of Governors
250 Outcropping Way
Folsom, CA 95630

Re: CAISO's Resource Adequacy Modeling and Program Design (RAMPD) Track 1 Initiative

Dear Members of the CAISO Board of Governors,

On behalf of Middle River Power ("MRP"), I would like to extend our sincere appreciation to the CAISO staff for their diligent and thoughtful work throughout the Resource Adequacy Modeling and Program Design ("RAMPD") Track 1 initiative. The effort to modernize and refine the default capacity accreditation methodologies and planning reserve margin (PRM) is both timely and necessary, and we commend CAISO for its commitment to transparency and stakeholder engagement.

MRP recognizes the importance of updating the default qualifying capacity ("QC") methodologies and default PRM in the CAISO Tariff. We understand that these default rules are intended to serve as a framework for Local Regulatory Authorities ("LRAs") that have not developed their own capacity accreditation and PRM approaches. While voluntary in nature, these default CAISO methodologies will influence broader market expectations and resource planning decisions.

MRP is concerned with the CAISO's final Unforced Capacity ("UCAP") proposal, which diverges from the draft final proposal in a significant way. Specifically, the final proposal includes all outages —except those caused by transmission constraints or force majeure events — in the UCAP calculation. This approach is based on the principle of excluding only events outside of management control. However, several outage types listed by CAISO clearly fall outside of a generator's control. For example, fuel insufficiency is typically due to gas pipeline operators performing maintenance, creating outages that generators cannot control or influence.

Additionally, CAISO operators approve or deny short-notice opportunity outages based on real-time grid conditions. Generator operators request these outages because of their short duration and because the CAISO determines that no substitute capacity is needed. Because these outages do not affect grid reliability or require substitute capacity, these outages should not be included in the UCAP calculations.

Instead, MRP respectfully urges the Board to modify CAISO's UCAP proposal to exclude outage types that are (1) beyond management control and (2) currently exempt from providing substitute capacity.

While Track 1 represents a significant step forward, MRP acknowledges that more work lies ahead. The complexities of resource accreditation, PRM calibration, and outage treatment require continued collaboration and refinement. We look forward to engaging with CAISO and other stakeholders in future phases of the RAMPD initiative to ensure that the final framework supports a robust and reliable Resource Adequacy program.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brian Theaker", with a long horizontal flourish extending to the right.

Brian Theaker
VP Western Regulatory and Market Affairs
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