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**Comments of Northern California Power Agency
Flexible Ramping Products – Second Revised Straw Proposal**

January 19, 2012

Northern California Power Agency (“NCPA”) provides the following comments in response to the Flexible Ramping Products second revised straw proposal posted by CAISO on January 5, 2012. NCPA strongly supports CAISO’s proposal to exclude metered subsystems that self manage variability and uncertainty from Flexible Ramping Product cost allocation.