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**Comments of Northern California Power Agency  
Reliability Services Initiative  
Draft Final Proposal**

**February 12, 2015**

Northern California Power Agency (“NCPA”) appreciates the opportunity to provide the following comments in response to the CAISO’s draft final proposal posted on January 22, 2015.

**Section 4.6 – MSS Load Following Flexible Capacity Requirements**

Section 4.6 of the draft final proposal describes the flexible capacity requirement that will be assigned to a Load Following Metered Subsystem (LF MSS) LSE. NCPA supports this element of CAISO’s proposal. NCPA does request however that certain language contained in Section 4.6 of the draft final proposal be revised to add clarity to the proposal. The last paragraph of that section reads as follows:

The ISO specifically exempts MSS load-following LSEs monthly and annual flexible capacity RA plan requirements. These plans are covered under section 40.10.5 for non-MSS load following LSE. Once an MSS load following LSE’s contribution to the flexible capacity need has been determined allocated, it would be required to provide monthly and annual flexible capacity RA plans consistent with the provisions of 40.10.5 of the ISO tariff.

NCPA requests that this paragraph in Section 4.6 be revised as follows:

The ISO specifically exempts MSS load-following LSEs monthly and annual flexible capacity RA plan requirements. These plans are covered under section 40.10.5 for non-MSS load following LSE. Once an MSS load following LSE’s contribution to the flexible capacity need for resources outside of the MSS load following portfolio has been determined allocated, it would be required to provide monthly and annual flexible capacity RA plans to show the flexible capacity it is committing to satisfy

| that requirement as determined herein, consistent with the provisions of 40.10.5 of the ISO tariff.