

Stakeholder Comments Template

Subject: Reliability Services

Submitted by	Company	Date Submitted
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This template has been created for submission of stakeholder comments on the Second Revised Draft Straw Proposal for the Reliability Services initiative that was posted on October 22, 2014. Upon completion of this template please submit it to RSA@caiso.com. Submissions are requested by close of business on **November 19, 2014**.

1. Please provide feedback on Part 1: Minimum eligibility criteria and must-offer rules.

Northern California Power Agency (NCPA) supports the MSS Load Following Flexible Capacity Requirement proposed by the CAISO is Section 4.6 of the second revised draft straw proposal.

2. Please provide feedback on Part 2: Availability Incentive Mechanism.

NCPA supports CAISO's proposal to use \$3.5/kW-month as the availability incentive mechanism price. NCPA agrees that the proposed price is more reflective of current Resource Adequacy bilateral market contract prices. NCPA also agrees that the proposed price is set at a level that will incent resource performance while not being draconian.

NCPA supports CAISO's proposal to exempt the uniquely situated resources identified in Section 6.13 (Exempt Resources) of the second revised draft straw proposal from the availability incentive mechanism. NCPA requests that CAISO clarify that Load Following MSS resources, as referenced in Section 6.13, include Load Following MSS resources that supply system, local and flexible capacity.

3. Please provide feedback on Part 3: Replacement and Substitution.

No comment at this time.

4. Please provide feedback on the proposed Phase II of the RSI.

No comment at this time.