



651 Commerce Drive
Roseville, CA 95678

phone (916) 781-3636
fax (916) 783-7693
web www.ncpa.com

**Comments of Northern California Power Agency
Reliability Services Initiative Phase 2
August 19, 2015 Straw Proposal**

September 9, 2015

Northern California Power Agency (“NCPA”) appreciates the opportunity to provide the following comments on the CAISO’s August 19, 2015 Reliability Services Initiative Phase 2 Straw Proposal.

LRA Resource Adequacy Program Template

NCPA is generally supportive of the CAISO’s effort to standardize the information submitted by LRAs regarding the details of their Resource Adequacy programs. While this effort will provide structure in order to make sure that the necessary information is shared, care should be taken to ensure that it does not cause the process to become so rigid that it hampers the CAISO’s ability to effectively adapt to circumstances that don’t fit the mold.

Substitute Capacity in Local Capacity Areas

NCPA appreciates the CAISO revisiting the concerns surrounding providing substitute capacity for Local Resource Adequacy capacity on outage. In the event that a local resource becomes unavailable due to a forced outage, the CAISO operators should maintain some discretion in working with the SC to provide effective substitute capacity for that local capacity requirement. NCPA supports the development of criteria for resources that would be considered effective substitute capacity for a Local RA resource.

With respect to substitution of system capacity for local capacity, NCPA supports the *status quo*.