

Stakeholder Comments Template

Flexible Resource Adequacy Criteria and Must Offer Obligation - Phase 2 Straw Proposal

Submitted by	Company	Date Submitted
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PGP appreciates the opportunity to submit comments on the ISO’s straw proposal for the Flexible Resource Adequacy Criteria and Must Offer Obligation - Phase 2 that was posted on December 11, 2015. PGP’s comments are focused on the provision of flexible capacity by import resources.

Provision of flexible capacity by import or export resources.

PGP is encouraged by the ISO’s evaluation and opportunity for 15-minute intertie resources to provide flexible resource adequacy capacity. PGP strongly supports the ISO’s proposal as it has the potential to provide great economic synergies for both the ISO entity and NW entity systems.

The ISO explicitly solicits stakeholder feedback on whether the resource specific criteria for intertie resources is necessary for non-EIM capacity. PGP agrees with the ISO’s objectives of avoiding double-counting and verifying the quality and amount of flexible capacity a resource can provide. However, PGP member utilities encourage the ISO to explore other options for meeting these objectives which would allow non-EIM entities to offer flexible capacity from a “system resource.” As currently defined, the resource specific requirement may disqualify external renewable hydro resources that operate as an integrated system from offering flexible capacity, limiting market participation by NW entities.

PGP is still evaluating the impact of the Maximum Import Capability (MIC) process on the provision of flexible capacity imports. It is our interest that the MIC allocation process assures deliverability while also permitting the broadest and most economic procurement of import resources so as to not unintentionally create market inefficiencies.