

# *Powerex Corp.*

## **Standard Capacity Product Phase II Comments on Straw Proposal**

<b>Submitted By</b>	<b>Company or Entity</b>	<b>Date Submitted</b>
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Powerex appreciates the opportunity to comment on the CAISO's Standard Capacity Product Phase II Straw Proposal.

Powerex's comments are limited to the modification of SCP availability metric for non-resource specific system resources that provide RA capacity. Powerex does not at this time object to the proposal to change the metric from bid in capacity to a metric consistent with internal RA resources based on outage information and de-rates. Powerex's position on this issue is predicated on the assumption that the CAISO's parallel stakeholder process, "Generated Bids and Outage Reporting for NRS-RA Resources", results in acceptable rules and procedures for inserting generated bids, when appropriate, and enabling such resources to utilize SLIC to report outages and de-rates to the ISO. Powerex understands at this time that NRS-RA Resources will not be required to use SLIC to report outages at CAISO scheduling points but that the CAISO is updating its software to automatically reject bids on open ties.

Powerex has no other comments at this time on this Straw Proposal.