

Submitted by	Company	Date Submitted
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Thank you for the opportunity to provide comments on the Frequency Response Phase 2 Issue Paper dated December 15, 2016.

In the CAISO’s Frequency Response Phase 1 initiative, the ISO filed tariff provisions to allow for procurement of Transferred Frequency Response. These annual contracts to allow a transfer of frequency response performance between BAAs have allowed the CAISO to ensure compliance with NERC Reliability Standard BAL-003-1 for 2017. Seattle City Light is pleased to provide Transferred Frequency Response service to CAISO.

In this second phase of the Frequency Response initiative, the ISO seeks to examine a market structure for frequency response procurement and compensation. The December 15, 2016 Issue Paper discusses the procurement and compensation of frequency response service from resources within CAISO’s BAA.

SCL looks forward to working with CAISO to develop and evaluate market mechanisms which allow Transferred Frequency Response to compete economically with the provision of Frequency Response from resources in the CAISO’s Balancing Authority Area. We believe that the entire western interconnection, including CAISO’s ratepayers, will benefit from such an effort to establish a frequency response market.

Thank you again for the opportunity to comment. Please don’t hesitate to contact me if you have any questions.