

Stakeholder Comments Template

Subject: Regional Resource Adequacy Initiative

| Submitted by | Company | Date Submitted |
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This template has been created for submission of stakeholder comments on the Revised Straw Proposal for the Regional Resource Adequacy initiative that was posted on April 13, 2016. Upon completion of this template please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on May 4, 2016.

Please provide feedback on the Regional RA Revised Straw Proposal topics:

1. Load Forecasting

Seattle City Light supports CAISO's taking a flexible approach towards LSEs and LRAs having a robust role in load forecasting.

2. Maximum Import Capability

Seattle City Light encourages CAISO to consider the Intertie ratings, rather than highest deliveries during high load periods, as part of the basis for determining MIC. Because the historic use will be less than total possible use, import capability could be unnecessarily restricted. Furthermore, ratings may be managed to ensure that Interties are reliable, which would have the added advantage of producing both reliability and economic benefits. Seattle City Light encourages the CAISO to continue to work with the Bonneville Power Administration and other intertie path operators to improve intertie availability and utilization in a safe and reliable manner.

3. Internal RA Transfer Capability Constraints

The Zonal RA concept is an interesting one that deserves additional development and detail. Seattle City Light encourages CAISO to fully develop the proposal including how it will interact with all other aspects of regional resource adequacy.

Additionally, CAISO should consider eliminating the planning distinction between constraints on Imports or Internal Transfers. Transmission constraints occur, and various planning efforts consider what actions, if any, are justified. These planning efforts eliminate the need for CAISO to make distinctions between internal and external constraints.

4. Allocating RA Requirements to LRAs/LSEs
5. Updating ISO Tariff Language to be More Generic
6. Reliability Assessment
 - a. Planning Reserve Margin

Seattle City Light encourages CAISO to move towards using a probabilistic loss of load study as the basis for establishing the PRM. A probabilistic study utilizes more available data than the status quo, and provides a more comprehensive planning model. Such a study raises new questions, particularly what probability to use as a threshold. The status quo does not and cannot answer this question although the risk remains present. Only the probabilistic approach can begin to identify the sources of uncertainty, and over time will allow utilities to reduce or manage that risk.

- b. Uniform Counting Methodologies

Seattle City Light is heavily reliant on cascading hydroelectric resources to serve load. How hydro could be “counted” is of utmost import. The distinction between storage and run-of-river is not always meaningful or consistently defined. Seattle uses hydro studies with differing terms; sometimes the lowest observed flows for a period of record, sometimes forecast flows based on historic flows. Seattle City Light encourages CAISO to allow LSEs to provide justification for establishing hydro capacity rather than using a prescriptive three year period.

- c. Backstop Procurement Authority

7. Other

Seattle City Light encourages CAISO to consider more options with sufficient detail to allow for analysis and comparison. In order to achieve the lowest cost and risk results, more than one approach needs to be considered.

Seattle City Light also encourages CAISO to incorporate performance measures into its planning. Performance measures will provide benchmarks to evaluate policies, which will allow both CAISO and participants to make better informed choices about future actions.