

Stakeholder Comment: Ancillary Services Focus Group 2 and Draft Attestation Forms

**Comments on Behalf of the Cities of Anaheim, Azusa, Banning,
Colton, Pasadena, and Riverside, California (“Six Cities”)**

As noted in their previous comments submitted on April 15, 2025, the Six Cities generally support the CAISO’s efforts to ensure testing of 100% of its resources certified to provide Ancillary Services (“AS”) within such time frames as are reasonable under all the circumstances, as required by the CAISO’s Tariff. The Six Cities do not oppose in concept the CAISO’s proposal to require periodic attestations submitted by Scheduling Coordinators and signed by resource owners affirming that the resource owners have tested the capabilities of their resources certified to provide AS. However, the Six Cities strongly oppose the overly broad and poorly defined form of the proposed attestation as set forth in the posted Attestation form and attached Attestation Criteria.

The Attestation Criteria propose to require Ancillary Services Providers (defined in Tariff Appendix A in terms of resources) to “acknowledge . . . that the certified resource meets or exceeds all applicable technical requirements for providing applicable Ancillary Services under the CAISO Tariff, BPM, and Operating Procedure requirements and that the Ancillary Services Provider routinely checks, monitors and/or tests their system and related equipment to assure availability of committed Ancillary Services.” An expressly non-exclusive list of criteria follows, to be “ensure[d]” through “routine checks, monitoring and/or testing.” The Attestation form and Criteria provide no definition of an acceptable timing sequence for “routine” testing or checking of equipment. Some of the listed items relate to capabilities of a certified resource, while other items refer to capabilities of the resource’s Scheduling Coordinator. Only one of the listed items provides a reference to a specific Operating Procedure.

In addition, some items listed in the criteria appear to be inconsistent with Tariff or BPM provisions. The fourth bullet point under the first list, requiring eight second response to CAISO instructions or telemetry, does not appear to be consistent with Tariff Appendix K, section B 1.3 (ability to receive dispatch instructions within 1 minute). Similarly, the third bullet point under the Regulation Up and Regulation Down list requires immediate response to CAISO signals, but Section 2.2.2 of the BPM for Market Operations requires delivery of Regulation products within 10 minutes.

The proposal to require an attestation that a certified resource “meets or exceeds” all applicable technical requirements under the CAISO Tariff, BPM, and Operating Procedures is unreasonably broad. Requirements relating to provision of AS are voluminous and are scattered across multiple pages of the Tariff and BPMs. Similarly, there appear to be multiple Operating Procedures that relate to AS requirements, but they are not grouped together in the Operating Procedures nor all clearly identified as relating to AS. The Six Cities question whether CAISO personnel responsible for testing and certification of AS resources would be prepared to sign an attestation as expansive as the version the CAISO proposes to require from resource owners.

The CAISO's presentation for the second Focus Group meeting described the purpose of the proposed attestation process as an alternative or supplement to CAISO testing to provide increased confidence in the ability of certified resources to provide AS. An overly broad and poorly defined attestation requirement will not serve that purpose and will impose undue burdens on AS resources. Instead of an attestation based on an "everything, everywhere, all at once" approach, the Six Cities recommend that the CAISO look to its own testing protocols to fashion an attestation process that focuses on the resource attributes the CAISO checks in its testing process, clearly identifies elements to be tested and metrics for passing or failing a test, clearly defines expected test intervals based on good utility practice, and reasonably limits the attestation required to the specific attributes or elements subject to the defined testing expectations.

The Six Cities also agree with commenters during the second Focus Group who challenged the appropriateness of the focus group process as a basis for establishing an attestation requirement. The focus group approach has not been as well organized as CAISO's standard initiative process. Six Cities representatives have found it difficult to locate documents related to the Focus Group meetings, and there have been delays in posting of stakeholder comments and recordings of the meetings. Because a failure to satisfy an attestation requirement could lead to loss of certification to provide AS, the Six Cities agree that an attestation requirement should be included in a BPM and subject to the BPM change management process.

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