

June 8, 2012

**COMMENTS ON BEHALF OF THE CITIES OF ANAHEIM, AZUSA, BANNING,  
COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA REGARDING FLEXIBLE  
RAMPING PRODUCT TECHNICAL WORKSHOP ISSUES**

In response to the ISO's request, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the "Six Cities") submit the following comments on issues raised in the Flexible Ramping Product Technical Workshop..

- The Six Cities agree that greater market effectiveness could be gained by creating the Flexible Ramping Product and generally support the ISO's initiative to establish this product.
- The Six Cities support the explicit procurement target approach for the Flexible Ramping Product. The implicit approach included in the most recent Technical Workshop presentation adds too much complexity that should not be introduced at this late stage in the process. Unless the ISO provides time for additional stakeholder review of the implicit procurement approach, the Cities recommend that the ISO implement the Flexible Ramping Product initially based on the explicit procurement approach and reevaluate the Flexible Ramping Product provisions after 6 - 12 months.
- The Six Cities generally agree with the ISO's current proposals for Flexible Ramping Product bidding rules, bid cap and floor, self-provision, factoring energy cost into the Flexible Ramping Product selection process, linking the DA Flexible Ramping award and the real-time energy bid, and co-optimizing the Flexible Ramping Products with Energy and Ancillary Services.
- The Six Cities support SCE's previously submitted comments on allocation of Flexible Ramping Product costs.

Submitted by

Bonnie S. Blair  
Thompson Coburn LLP  
1909 K Street N.W.  
Suite 600  
Washington, D.C. 20006-1167  
[bblair@thompsoncoburn.com](mailto:bblair@thompsoncoburn.com)  
202-585-6905

Attorney for the Cities of Anaheim, Azusa,  
Banning, Colton, Pasadena, and Riverside,  
California