

October 10, 2016

**COMMENTS ON THE JOINT ISO-CPUC
WORKSHOP DISCUSSION ON SLOW RESPONSE
LOCAL CAPACITY RESOURCE ASSESSMENT
ON BEHALF OF THE CITIES OF
ANAHEIM, AZUSA, BANNING, COLTON,
PASADENA, AND RIVERSIDE, CALIFORNIA**

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 the Joint ISO-CPUC Workshop Discussion on Slow Response Local Capacity Resource Assessment ("Joint Workshop Discussion").

During the Joint Workshop Discussion, there was concern that slow starting Demand Response ("DR") resources could not be pre-dispatched through Minimum Online Commitment ("MOC"), the current tool used for ensuring N-1-1 security, which allows for the pre-dispatch of slow response local Resource Adequacy ("RA"). Therefore, the ISO and the CPUC discussed the potential option of creating a new tool that could accommodate the pre-dispatch of slow response DR resources. The Six Cities are not opposed to creating a new tool to accommodate the use of slow response DR resources as Local RA capacity. However, the Six Cities request that the ISO not create a tool that would limit the ability of other non-DR slow response resources from qualifying as local RA capacity. Any tool created for this purpose should avoid adverse impacts on those resources that already qualify as local RA and the ability of the ISO to pre-dispatch such resources.

Submitted by,

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