

Stakeholder Comments Template

Reliability Services Initiative - Phase 2

Revised Draft Final Proposal

Submitted by	Company	Date Submitted
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This template has been created for submission of stakeholder comments on the revised draft final proposal for the Reliability Services Initiative - Phase 2 that was posted on July 7, 2016. The revised draft final proposal and other information related to this initiative may be found at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/ReliabilityServices.aspx>.

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **July 21, 2016**.

If you are interested in providing written comments, please organize your comments into one or more of the categories listed below as well as state if you support, oppose, or have no comment on the proposal.

1. Clarify Local Regulatory Authority (LRA) interaction and process alignment. *Please state if you support (please list any conditions), oppose, or have no comment on the proposal.*

No comment at this time.

2. Substitution for flexible capacity resources on planned outage. *Please state if you support (please list any conditions), oppose, or have no comment on the proposal.*

No comment at this time.

3. Separate local and system RA for purpose of forced outage substitution. *Please state if you support (please list any conditions), oppose, or have no comment on the proposal.*

SVP strongly supports the CAISO's proposal to not create an additional template for reporting of system and local showings.

4. Process to update EFC list during the year. *Please state if you support (please list any conditions), oppose, or have no comment on the proposal.*

No comment at this time.

5. Address the RAAIM exemption currently in place for combined flexible capacity resources. Please state if you support (please list any conditions), oppose, or have no comment on the proposal.

No comment at this time.

6. Streamlining monthly RA showings. Please state if you support (please list any conditions), oppose, or have no comment on the proposal.

SVP does not support the CAISO's proposal to no longer automatically roll LSEs' annual RA showings into the monthly showings. Though SVP appreciates CAISO's time and effort in developing the reporting and communication tool within the CIRA application, we would like the CAISO to exhibit caution and automatically roll over LSEs' annual showings into the monthly showings until the tool is fully functional and free of any software defects prior to having Market Participants rely on the notifications. Just last week, the CIRA application erroneously flagged submittals for the September 2016 compliance month as a "late submission" even though the RA/Supply plans were submitted on 7/18/2016, which is in line with the date posted on the reliability requirement website. Any miscommunication or delay in notification will likely result in penalties assessed to LSEs for missing deadlines.

7. RA showing requirements for small LSEs. Please state if you support (please list any conditions), oppose, or have no comment on the proposal.

No comment at this time.

8. Other