

Hi Cynthia:

Thanks for the information. Please find SVP's comments below.

Silicon Valley Power (SVP) appreciates the opportunity to provide comments on the CAISO's Standard Capacity Product Phase II (SCP II) straw proposal.

SVP has read and gives its support to the comments provided earlier this week by NCPA on the SCP II proposal.

In general, since there is no proposed tariff language to review, it is difficult to determine the exact impact of the straw proposal, and thus SVP reserves the right to raise issues identified later when proposed tariff language is circulated. SVP believes that it is inappropriate to add the Replacement Rule at this stage. The straw proposal appears to change the existing substitution option into a requirement for a planned necessary event, which is not necessarily an indication of the reliability of a generator. SVP also finds the language proposing a modification of the availability metric for Non-Resource Specific System Resources to be unclear, and SVP reserves the right to raise issues later when tariff language is proposed.

Please feel free to contact me if you have any questions regarding these comments.

Thank you,

Ken Kohtz
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