

## Western's Comments on Flexible Resource Adequacy Criteria and Must Offer Obligation - Phase 2 Straw Proposal

Submitted by	Company	Date Submitted
<i>Tong Wu</i>	<i>Western Area Power Administration Sierra Nevada Region</i>	<i>1/6/2016</i>

Western Area Power Administration Sierra Nevada Region (Western) is a federal agency and is responsible for marketing federal hydropower generated by the Central Valley Project (CVP) to preference power allottees and to serve project-use energy pumping requirements to meet its contractual and statutory duties. Within northern California, Western serves load in both the Balancing Authority of Northern California and the California Independent System Operator (CAISO). Western delivers its generation from many large and small hydro facilities of the CVP to its loads. Western owns, operates and maintains an extensive high voltage transmission network extending to the load center of northern California.

Western is providing comments in the following categories requested by the CAISO.

1. Provision of flexible capacity by import or export resources,

Western recently signed a Market Efficiency Enhancement Agreement (MEEA) with the CAISO. According to the MEEA, certain schedules identified by specific intertie resource IDs and verifiable by associated e-tags are deemed delivered from a basket of CVP hydro generation units in northern California. Western believes such resource IDs under MEEA should be considered as resource specific and therefore allowed the opportunity to provide flexible RA should Western decide to so designate.

6. Other.

Moreover, since these resource IDs under MEEA represent specific generation units in northern California, they should be allowed the opportunity to provide system, local and flexible RA following the same rules that are applicable to other hydro generation units in northern California. The resource IDs under MEEA should be eligible for the energy limited hydro generator status when they are only providing system and local RA.