

Stakeholder Comments Template

**Flexible Resource Adequacy Criteria and Must-Offer Obligation
Fifth Revised Straw Proposal, Posted January 17, 2014**

Submitted by	Company	Date Submitted
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Wellhead supports the CAISO's Fifth Revised Straw Proposal of the Flexible Resource Adequacy Criteria and Must-Offer Obligation in its entirety, including the deferral of the SFCP and substitution rules.

Wellhead would specifically like to applaud the CAISO for the development of the four distinct technology agnostic categories; though we believe that further granularity of the definitions (specifically category 1) should be provided to the stakeholders as soon as possible. Wellhead believes that the use of these categories, derived from a needs-based approach, will provide the CAISO with the right resources required to meet its ramping needs and provide an incentive for new technologies to provide greater range.

Wellhead encourages the ISO to continue to assess the need for provisions that would limit the amount of baseload and/or PMin as part of capacity showings by publishing a soft target.