

Western Power Trading Forum comments on Second Revised Draft Final Proposal for Reliability Services Initiative

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WPTF appreciates the opportunity to comment on the September 16, 2016 Second Revised Draft Final Proposal for Reliability Services.

We support the ISO's decision to delay planned outage rules for flexible RA until a later time.

The current flexible RA product is an interim product and so it is appropriate to delay creating planned outage rules until the ISO at a minimum has developed a permanent flexible RA product. There is no immediate reliability need for planned outage rules and it would be costly for market participants to comply with new rules and costly for the ISO to implement.

WPTF supports the proposal to change RA showing rules for local resources.

Requiring local substitution for capacity that is not needed to meet the local requirement is unnecessary costly and onerous. Implementing complex RA rules is challenging and often leads to the implementation being delayed. WPTF highly encourages the ISO to work with market participants after BOG approval to streamline rules in the BPM as much as acceptable to reduce implementation and contracting complexity.