

## Western Power Trading Forum comments on Reliability Services Phase 2 Revised Straw Proposal

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WPTF appreciates the opportunity to comment on the Reliability Services Phase 2 Revised Straw proposal.

### **Flexible planned outage rules should be consistent with system planned outage rules.**

WPTF believes the ISO should have consistent flexible and system planned outage rules. In the board-approved system planned outage requirements<sup>1</sup>, a supplier is only required to provide replacement if the ISO first identifies a system shortage and then will require replacement from suppliers based on a “first in, last out” principle. WPTF requests clarification on the flexible planned outage rules and supports the flexible planned outage rules working in the same manner as the system planned outage rules.

### **WPTF supports the forced outage substitute capacity proposal for local RA.**

WPTF supports the ISO’s proposal for Local RA substitution and looks forward to working further with the ISO to refine the details. One of these details is whether all local capacity or only local capacity that is indicated as local by the supplier is used in the monthly local collective deficiency check. WPTF can see an argument both ways; however, believes that it may be more consistent to only count the local capacity indicated as local by the supplier in the check. Otherwise an LSE could procure a single MW of local capacity from many resources at a premium and the rest of the capacity on a resource as system, and still have that system capacity counted as local for their RA validation.

### **WPTF requests more detail on the planned outage substitute capacity proposal for local RA.**

WPTF requests additional details on the local RA planned substitution process. It is unclear whether the ISO has sufficient tariff authority and process in place to handle the approvals of local resource planned outages or not. It is WPTF’s understanding there are no local planned outage replacement rules and therefore would like additional details and citations on the rules regarding local planned outages.

### **WPTF requests additional details on the rules related to updating resources operational parameters and their flexible RA qualification.**

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<sup>1</sup> Reliability Services Initiative phase 1b has not yet been proposed to FERC

WPTF agrees with SDG&E's comments on the Straw Proposal regarding flexible category limitations.<sup>2</sup> They stated that the ISO needs to be more specific regarding the limitations for each category. Current tariff language allows resources with 30 starts per month to qualify for flexible RA Category 1 if the minimum up and down times prohibit the resource from meeting the 60 start-ups per month requirement. WPTF seeks clarification on whether these resources would be placed into Category 2 under the new proposal.

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<sup>2</sup> <http://www.caiso.com/Documents/SDGEComments-ReliabilityServicesPhase2-StrawProposal.pdf> (page 2)