



Stakeholder Comments Template

Resource Adequacy Revised Straw Proposal

This template has been created for submission of stakeholder comments on the *Resource Adequacy Revised Straw Proposal* that was published on July 1, 2019. The proposal, stakeholder meeting presentation, and other information related to this initiative may be found on the initiative webpage at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/ResourceAdequacyEnhancements.aspx>

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on July 24.

Submitted by	Organization	Date Submitted
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Please provide your organization’s comments on the following issues and questions. Please explain your rationale and include examples if applicable.

1. System Resource Adequacy

- Please provide your organization’s feedback on the *Determining System RA Requirements* as described in *Section 5.1.1*.

Boston Energy has no comments at this time.

- Please provide your organization’s feedback on the *Forced Outage Rates and RA Capacity Counting* as described in *Section 5.1.2*.

Boston Energy asks the ISO to clarify how the forced outage rates and RA capacity counting rules proposed would apply to a generator that participates in the ISO’s market through a net -scheduled participating generator agreement. Clarification is critical given the net-scheduled participating generator agreement allows for a resource to be bid, scheduled, and dispatched on a gross basis. Specifically, the CAISO’s next proposal should address how the ISO’s will ensure that the UCAP formula applied to a net-scheduled participating generator is consistent with an NQC value that reflects the resource maximum net output to the CAISO grid?

- Please provide your organization's feedback on the *System RA Showings and Sufficiency Testing* as described in *Section 5.1.3*.

Boston Energy has no comments at this time.

- Please provide your organization's feedback on the *Must Offer Obligation and Bid Insertion Modifications* as described in *Section 5.1.4*.

Boston Energy seeks numerous clarifications from the ISO regarding the proposed must offer obligation rules included in the revised proposal.

1. The proposal states that the must offer obligation will be consistent with the resources NQC, not UCAP value. Does the ISO intend to apply the must offer obligation at the NQC level only for resources that shown their full NQC as RA or will the ISO must offer obligation be the lessor of NQC or RA value?
2. The proposal states in table 5 that the standard must offer obligation for a NGR resource should reflect charge/discharge capabilities. CAISO needs to provide further clarification as to what this actually means.

Section 5.1.2 doesn't indicate any changes to how the NQC value for a NGR will be determined. Therefore, this language seems to imply that an NGR's must offer obligation, when not providing flexible RA, has the potential to be greater than its NQC value. If this is true it introduces a disconnect for NGR's because their NQC value is based solely on the discharge range, but the must offer obligation could include the charging capabilities of the NGR. Boston Energy is very concerned with this aspect of the proposal and asks the ISO to further review and ensure the proposal isn't imposing additional requirements on NGR resource that aren't imposed on non-NGR's.

3. Consistent with comments on section 5.1.2 above, Boston Energy asks the ISO to clarify how the revised must offer and bid insertion rules would apply to a resource participating under a net-scheduled participating generator agreement?
 - Please provide your organization's feedback on the *Planned Outage Process Enhancements* as described in *Section 5.1.5*.

Boston Energy asks the CAISO to provide further clarity on the proposal to require like for like replacement obligation. The current RA bilateral contracting structure is based on resources categories that are either "System", "Local" and/or "Flexible". If the ISO is indicating that the POSO process will include some type of sub categories based on unit characteristics then future stakeholder discussion is required as this would introduce a distinct difference between the bilateral contracting process for RA and the contracting process for curing a POSO requirement.

- Please provide your organization's feedback on the *RA Import Provisions* as described as described in *Section 5.1.6*.

Boston Energy provides no comments at this time.

- Please provide your organization's feedback on the *Maximum Import Capability Provisions* as described in *Section 5.1.7*.

Boston Energy is supportive of the idea increasing the access to MIC for RA contracting purposes. We look forward to further details/discussion on the ISO auction concept.

In summary, please provide your organization's position on System Resource Adequacy (Section 5.1). (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

The CAISO is proposing substantial changes to the current RA process. At this time Boston Energy seeks additional clarification from the ISO before its able to provide the ISO with a formal position.

2. Flexible Resource Adequacy

- Please provide your organization's feedback on the *Identifying Flexible Capacity Needs and Requirements* as described in *Section 5.2.1*.

Boston Energy has no comments at this time.

- Please provide your organization's feedback on the *Identifying Flexible RA Requirements* as described in *Section 5.2.2*.

Boston Energy has no comments at this time.

- Please provide your organization's feedback on the *Setting Flex RA Requirements* as described in *Section 5.2.3*.

Boston Energy has no comments at this time.

- Please provide your organization's feedback on the *Establishing Flexible RA Counting Rules: Effective Flexible Capacity Values and Eligibility* as described in *Section 5.2.4*.

With respect to determining EFC values for VERs, Boston Energy asks the ISO to clarify in the next proposal if the EFC calculation and must offer obligation rules will be solely based on the physical capabilities or the VER?

- Please provide your organization's feedback on the *Flexible RA Allocations, Showings, and Sufficiency Tests* as described in *Section 5.2.5*.

Boston Energy has no comments at this time.

- Please provide your organization's feedback on the *Flexible RA Must Offer Obligation Modifications* as described in *Section 5.2.6*.

With respect to determining EFC values for VERs Boston Energy asks the ISO to clarify in the next proposal if the EFC calculation and must offer obligation rules will be solely based on the physical capabilities or the VER?

In summary, please provide your organization's position on Flexible Resource Adequacy (Section 5.2). (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

The CAISO is proposing substantial changes to the current RA process. At this time Boston Energy seeks additional clarifications from the ISO before its able to provide the ISO with a formal position.

3. Local Resource Adequacy

- Please provide your organization's feedback on the *Local Capacity Assessments with Availability Limited Resources* as described in *Section 5.3.1*.

Boston Energy has no comments at this time.

- Please provide your organization's feedback on the *Meeting Local Capacity Needs with Slow Demand Response* as described in *Section 5.3.2*.

Boston Energy has no comments at this time.

In summary, please provide your organization's position on Local Resource Adequacy (Section 5.3). (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

The CAISO is proposing substantial changes to the current RA process. At this time Boston Energy seeks additional clarifications from the ISO before its able to provide the ISO with a formal position.

4. Backstop Capacity Procurement Provisions

- Please provide your organization's feedback on the *Capacity Procurement Mechanism Modifications* as described in *Section 5.4.1*.

Boston Energy has no comments at this time.

- Please provide your organization's feedback on the *Reliability Must-Run Modifications* as described in *Section 5.4.2*.

Boston Energy has no comments at this time.

- Please provide your organization's feedback on the *UCAP Deficiency Tool* as described in *Section 5.4.3*.

Boston Energy has no comments at this time.

In summary, please provide your organization's position on Backstop Capacity Procurement Provisions (Section 5.4). (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

The CAISO is proposing substantial changes to the current RA process. At this time Boston Energy seeks additional clarifications from the ISO before its able to provide the ISO with a formal position.

Additional comments

Please offer any other feedback your organization would like to provide on the Resource Adequacy Revised Straw Proposal.

Boston Energy has no additional comments at this time.