



Stakeholder Comments Template

Resource Adequacy Enhancements – Straw Proposal Part 1

This template has been created for submission of stakeholder comments on Resource Adequacy Enhancements Straw Proposal Part 1 that was published on December 20, 2018. The Straw Proposal Part 1, 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.

Submitted by	Organization	Date Submitted
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Submissions are requested by close of business on February 6, 2019.

Please provide your organization's comments on the following issues and questions.

1. Rules for Import RA

Please provide your organization's feedback on the Rules for Import RA topic. Please explain your rationale and include examples if applicable.

2. RAIM Enhancements & Outage Rules

a. Please provide your organization's feedback on the Addressing Planned and Forced Outage Issue topic. Please explain your rationale and include examples if applicable.

b. Please provide your organization's feedback on the RAIM Enhancements topic. Please explain your rationale and include examples if applicable.

Please retain the exemption from RAIM for CHP resources. There are two reasons: first, as recognized when exemption originally created, the

compensation paid to CHP resources under standard contracts under CPUC QF Settlement already factor in historical record of availability. CHP resources already receive reduced compensation for outage record. Imposing RAAIM would impose a second penalty for outages. Second, under the QF Settlement standard contracts, all RA attributes associated with capacity provided under the contract belong to the purchasing utility. The utility controls what if any use is made of the capacity to satisfy RA obligations. The generator does not control what RA compliance is associated with its output and should not be held accountable by ISO.

- i. Please provide your organization's feedback on the Availability & Performance Assessment Triggers options presented in the proposal.

3. Local Capacity Assessments with Availability-Limited Resources

Please provide your organization's feedback on the Local Capacity Assessments with Availability-Limited Resources topic. Please explain your rationale and include examples if applicable.

4. Meeting Local Capacity Needs with Slow Demand Response

Please provide your organization's feedback on the Meeting Local Capacity Needs with Slow Demand Response topic. Please explain your rationale and include examples if applicable.

Additional comments

Please offer any other feedback your organization would like to provide on the RA Enhancements Straw Proposal Part 1.