

## Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Comments on December 12, 2018 second revised straw proposal.

### RMR and CPM

- a. Provide notice to stakeholders of resource retirements

**Comments: The CAISO should either lower the MW-based notification threshold or eliminate it entirely as the state transitions to a cleaner and more decentralized procurement landscape.**

EBCE appreciates the ISO's consideration of stakeholder comments thus far and its commitment in the second revised straw proposal to lower the notification threshold to 45 MW from 100 MW. However, EBCE strongly supports other stakeholders' recommendations to lower the notification threshold to 20 MW or to eliminate it entirely. By lowering or eliminating the threshold for notification, the CAISO will help ensure that all load-serving entities ("LSEs") are properly notified of significant resource retirements.

EBCE understands that apart from the ISO Daily Briefing, resource retirement notifications are discoverable on the CAISO's "Announced Retirement and Mothball List" published online; however, EBCE respectfully points out that many LSEs, including Community Choice Aggregators ("CCAs"), have limited ability to dedicate staff time to regularly monitoring the online list.

Finally, to implement the goals of Senate Bill ("SB") 100, there is a near-term need to ensure that resource retirements and procurement activities proceed in a coordinated manner, and a longer-term need to achieve 100% clean energy statewide. As the number of LSEs across the state continues to increase and procurement activities become more decentralized as a result, LSEs must have a clear and timely view of all potential opportunities to procure new resources to meet the need for new capacity and cleaner energy resources. The CAISO should ensure proper notification of all potential retirements as first step toward meeting the goals of SB 100.

- b. Clarify use of RMR versus CPM procurement

**Comments: The CAISO should create an “RMR Notice and RA Process Timeline” that reflects a *residual* buyer scenario for the RA program.**

EBCE appreciates the ISO's efforts to clarify the use of CPM and RMR procurement, and to explain how these forms of backstop procurement will interact with the Resource Adequacy (“RA”) program. The CAISO in its second revised proposal includes an “RMR Notice and RA Process Timeline”<sup>1</sup> that assumes the existence of a central buyer for RA capacity. EBCE notes that the central buyer issue is currently under active discussion in the CPUC RA proceeding, where many stakeholders strongly support a residual – rather than central – buyer model.

Since the existence of a central buyer is not guaranteed at this time, EBCE recommends that the CAISO revise the staff proposal to either (1) include an alternative “RMR Notice and RA Process Timeline” that reflects a decentralized procurement scenario, including a residual buyer, in addition to the central buyer-based timeline already provided; or (2) wait until the current phase of the CPUC RA proceeding concludes before defining how the three mechanisms (RA, CPM, and RMR) may interact.

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<sup>1</sup> Second Revised Straw Proposal (<http://www.aiso.com/Documents/SecondRevisedStrawProposal-ReliabilityMustRunandCapacityProcurementMechanismEnhancements.pdf>), Figure 3 at p. 15.