



Stakeholder Comments Template

Resource Adequacy Enhancements

This template has been created for submission of stakeholder comments on the Resource Adequacy Enhancements third revised straw proposal that was published on December 20, 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/StakeholderProcesses/Resource-Adequacy-Enhancements>

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **January 27, 2020**.

Submitted by	Organization	Date Submitted
<i>Brian Theaker</i> 530-295-3305	<i>Middle River Power, LLC</i> (“MRP”)	<i>January 27, 2020</i>

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

1. System Resource Adequacy

Please provide your organization’s feedback on the System Resource Adequacy topic as described in section 5.1. Please explain your rationale and include examples if applicable.

- **Aligning a UCAP paradigm with a multi-year forward paradigm**

MRP supports the CAISO’s efforts to ensure that Resource Adequacy (“RA”) requirements provide the CAISO with the capacity it needs to meet system, local and flexible reliability requirements through a portfolio that is increasingly made up of variable, use- and duration-limited resources.

That said, MRP remains concerned about moving to a UCAP paradigm. MRP has two primary concerns. First, MRP is concerned about how a paradigm in which a resource’s ability to count towards meeting reliability requirements changes year to year will align with a goal that MRP believes it shares with the CAISO, namely, the implementation of multi-year forward requirements for all RA products (local, system and, if it persists, flexible capacity). MRP urges the CAISO to consider how the

proposed UCAP paradigm will align with multi-year forward RA requirements and discuss this topic in the next revised straw proposal.

Second, MRP is concerned about whether UCAP is the right solution to the right problem, as further elaborated below. The CAISO has presented information that purports to show that the Resource Adequacy Availability Incentive Mechanism (“RAAIM”) has not been effective in securing substitute capacity for forced outages, but the CAISO also acknowledges that it does not know why this is the case.¹ Given that this seems to be part of the impetus for proposing moving to a UCAP paradigm, MRP suggests that the CAISO and market participants should understand why RAAIM has not secured substitute capacity for forced outages before fully considering the reasonableness of the CAISO’s proposal.

MRP comments on other specific aspects of the CAISO’s proposal below.

- **Assigning UCAP on a unit-specific basis for some, but not all, resources**

MRP remains concerned that the CAISO intends to determine and assign unit-specific UCAP values to some of the fleet (ironically, the portion of the fleet that is most capable of supporting reliability under all conditions) but intends to apply fleet-average (e.g., ELCC-based) UCAP values to a wide range of other resources, such as Qualifying Facilities, Demand Response, wind and solar resources. Where resources whose UCAP values are assigned on a fleet-wide basis under-perform relative to the fleet average, those resources, unlike resources that are assigned a unit-specific UCAP value, will not be penalized, an outcome which runs counter to the purpose of adopting UCAP requirements. The CAISO recognizes this. Elsewhere in the 3RSP, the CAISO disagrees with the California Energy Storage Alliance’s recommendation to use class average UCAP values, noting that “...using technology or fleet average values to calculate UCAP values does not provide the correct incentives for resources.”²

All of that said, if the CAISO were to adopt fleet-wide average UCAP values, it should do so for all resources, not just for some resources. One advantage that fleet-wide average UCAP values would have is that such values are likely to be less volatile year-to-year than unit-specific UCAP values. The lower volatility, smaller-changing UCAP values would pose less risk and challenge to implementing multi-year forward RA requirements for all RA products.

- **Deriving UCAP values**

- **Determining seasonal UCAP values from the “100 tightest supply cushion hours”.**

¹ 3RSP at page 28.

² 3RSP at page 78.

The CAISO proposes to assess UCAP based on a subset of “the 100 tightest supply cushion hours”:

The CAISO proposes to determine the 100 tightest supply condition hours during each summer and winter season based upon available RA for each hour compared to hourly loads. The CAISO will provide additional clarity on how this determination will be made with examples in future proposal iterations. (3RSP at page 18).

MRP requests clarification on what the CAISO intends. While the phrase “available RA compared to hourly loads” implies that the CAISO will select the 100 hours in which the ratio of available (not committed) RA relative to the hourly load is the lowest, it is possible that this ratio might not yield those 100 hours that are of the greatest operational concern or challenge.

MRP looks forward to the CAISO’s additional examples. MRP also requests that the CAISO provide market participants with several years of hourly load and available RA data so that market participants can conduct their own evaluation as to what subset of hours would best support UCAP calculations.

Finally, the CAISO’s proposal further decouples a resource’s UCAP from its offer obligation. This will have the effect of penalizing unavailability in certain hours but not in others. If a resource’s unavailability in certain hours is not needed to maintain reliability, it begs the question of why the resource should be obligated to offer in those hours. The CAISO should strive to achieve a reasonable balance between a resource’s offer obligation and its availability performance assessment period; requiring to offer in all hours but assessing performance in a very small fraction of those hours does not yet seem to strike a reasonable balance.

- **Determining UCAP values for wind and solar resources**

The CAISO proposes that the UCAP value for wind, solar and demand response (“DR”) resources will be their Effective Load Carrying Capability (“ELCC”) RA capacity values.³ The CAISO asserts that forced outage rates are already accounted for in the profiles used to determine ELCC values for these resource types.⁴ Finally, where certain resource types (DR and Qualifying Facilities) may not have ELCC-based RA capacity values, the

³ 3RSP at page 20.

⁴ 3RSP at FN 13. Again, MRP is aware that ELCC values are derived from wind and solar profiles, but is not aware of exactly how those profiles account for forced outages. MRP again asks the CAISO to explain exactly how forced outage rates are accounted for in wind and solar ELCC values.

CAISO proposes to evaluate these resource's performance relative to their dispatch instructions over a three-year period.⁵

MRP remains concerned that the CAISO intends to calculate unit-specific UCAP values for some, but not all, of the resources that meet RA requirements. As noted above, this means that resources whose UCAP is set on a fleet average basis but who underperform relative to the fleet average will not be penalized. Further, understanding how much capacity the CAISO proposes will be subject to unit-specific UCAP values relative to how much capacity will be assigned UCAP values on a different basis will help market participants assess the reasonableness of the CAISO's proposal. MRP therefore respectfully requests that the CAISO identify in a future iteration of its RA Enhancements proposal what the aggregate UCAP value of these resources that will be subject to fleet-average UCAP values is projected to be.

MRP also observes that setting some resources' UCAP values at their ELCC values does not advance an important goal of adopting UCAP values, namely, improving transparency over forced outage rates.⁶

Finally, MRP believes that the current ELCC-based RA capacity values for wind and solar, while recently improved, still may remain overstated because of how the ELCC analysis treats behind-the-meter resources, which in turn would lead to overstated ELCC and therefore overstated UCAP values for those resources.

- **UCAP data collection**

The CAISO proposes to require generators to submit five years of unit-specific Generator Availability Data System ("GADS") data to develop initial UCAP values and to reconfigure its Outage Management System ("OMS") or develop an alternative data collection system to use to set unit-specific UCAP values.

MRP shares the CAISO's concern that relying on GADS data to set UCAP values would exempt a growing number of resources who are exempt from submitting GADS data because they are 20 MW or less in size. MRP requests the CAISO identify how much capacity, both on a nameplate basis and on an ELCC basis, would not have to submit GADS data because the associated resources are 20 MW or less in size.

MRP agrees with the CAISO that "...a good area to focus on for this stakeholder process is defining the type/nature of outages that will be assessed

⁵ 3RSP at page 22.

⁶ 3RSP at page 26.

against a resource's forced outage rate. It is a vital issue to establish an accurate and fair forced outage rate definition."⁷

- **Nature of Work UCAP classifications**

MRP reiterates its request that the CAISO differentiate between fuel insufficiency conditions that are the result of the generators' actions or inactions, which reasonably should count against a resource's UCAP, and fuel insufficiency conditions that are the result of pipeline conditions outside of the generator's control, which should not count against a resource's UCAP. Beyond fuel insufficiency, the CAISO should extend that same differentiation to all relevant nature of work categories. Only those forced outages that are within the generator's control should count against UCAP values; forced outages that are beyond the generator's control should not count against UCAP. This likely will require expanding the nature of work categories to not only differentiate different nature of work outages, but between those nature of work outages that are within the generator's control.

- **Must-Offer Obligations**

As noted above, the CAISO proposes that resources providing RA capacity have a 24x7 MOO,⁸ while resources providing flexible RA capacity will have a 16 x 7 MOO (5 AM to 9 PM) for their EFC (which the CAISO offers could be different than their NQC).⁹

The CAISO also proposes that UCAP resources have a Day-Ahead obligation to offer up to their NQC values. RA resources will have an obligation to offer only to the extent of their DA energy schedules, ancillary service schedules or Day-Ahead Imbalance Reserve ("DAIR") awards.

MRP remain open to limiting the RT MOO to capacity from resources committed and awarded in the Day-Ahead market, but notes that eliminating the RT MOO for resources not awarded in the DA market will not address concerns raised by other parties about market participants economically withholding from the Day-Ahead market so as to extinguish the real-time MOO for their resources. Further, the success of this proposal to restrict the RT MOO to capacity from those resources awarded in the Day-Ahead market also depends heavily on the CAISO procuring enough DAIR. All of these things are being or will be discussed in the Day-Ahead Market Enhancements ("DAME") initiative, but those issues have not yet been resolved in that initiative.

⁷ 3RSP at pages 22-23.

⁸ 3RSP at page 32.

⁹ 3RSP at page 77.

Finally, the CAISO proposes to exempt several resource types from having to comply with the “standard” MOO (24 x 7), including intermittent resources, non-resource specific imports,¹⁰ Non-Generator Resources, Proxy Demand Resources, et al.¹¹ MRP is concerned about exempting some resources from the standard MOO applied to other resources and requests that the CAISO identify the amount of capacity associated with these proposed exemptions.

- **Eliminating RAAIM penalties for forced outages**

The CAISO observes that RAAIM is not providing sufficient incentives for generators to provide substitute capacity for forced outages and proposes to eliminate RAAIM once UCAP has been implemented.¹² In concluding that RAAIM is not providing sufficient incentive for generators to supply substitute capacity for forced outages, the CAISO acknowledges that it cannot determine why that is the case. It seems possible that if generators *were* providing substitute capacity for forced outages, there would be no need to adopt a UCAP mechanism, as the CAISO would have the RA capacity it required. MRP therefore respectfully urges the CAISO to dig deeper into the reason why generator owners are not providing substitute capacity for forced outages (to what extent is this due, e.g., to insufficient availability in local areas, generators that are exempt from RAAIM, etc.) to determine if UCAP is indeed the right solution to the right problem.

That said, MRP remains open to eliminating RAAIM penalties for forced outages as part of an overall package of RA reforms. MRP’s ultimate position on this issue will depend on how this benefit compares to the burdens of the CAISO’s proposal.

- **UCAP Deficiency Analysis**

The CAISO proposes to conduct an analysis, using only the shown RA fleet, to assess whether sufficient UCAP has been procured in aggregate. Of the three possible modeling approaches presented (net load deterministic, generator stochastic and full stochastic), the CAISO indicates that it favors using the snapshot net load deterministic model using the CEC’s 1-in-2 hourly load forecast and using the ability to serve load and ancillary service requirements to assess the sufficiency of the portfolio at this time.¹³ The CAISO proposes using this shallowest and simplest of the modeling approaches because of the time constraint involved (the CAISO must provide feedback as to whether the portfolio is sufficient within ten days of the showing). The CAISO is also proposing to use the Maximum Cumulative Capability

¹⁰ At the January working group meetings, the CAISO expressed a willingness to reconsider requiring RA imports to be resource-specific. MRP strongly supports requiring that RA imports be resource-specific.

¹¹ 3RSP at page 38.

¹² 3RSP at page 2

¹³ 3RSP at page 31.

(“MCC”) buckets to ensure that LSEs are not relying on an undue amount of variable, use-limited and duration-limited resources.

MRP is sympathetic to the time constraints the CAISO faces, but is not convinced that a snapshot deterministic analysis will yield reliable results, especially when a 1-in-2 demand forecast is used as the basis for that analysis. Moreover, the CPUC will be considering the MCC buckets in Track 2 of the current RA rulemaking, and the viability of the CAISO’s proposal will hinge in part on how MCC buckets will be treated going forward.

- **Planned Outage Process**

MRP supports the CAISO’s objectives and principles for the planned outages assessment process:¹⁴

- Encourage resource owners to enter outages as early as possible
- Avoid cancellation of any approved planned outages to the extent possible
- Minimize the need to require substitute capacity to greatest extent possible
- Identify specific replacement requirements for resources requiring replacement
- Allow owners to self-select, or self-provide, replacement capacity
- Include development of a CAISO system for procuring replacement capacity

The CAISO seeks stakeholder feedback on two proposed options:

Option 1 involves the CAISO separating outages into three types: planned (submitted at least 45 days before the RA month); post-RA planned (submitted between 44 and eight days prior to the date of the outage) and forced outages (submitted with less than eight days’ notice). The CAISO will allow resources to be shown on RA plans for a subset of days in the month. The CAISO will continue to assess whether there is sufficient capacity – including substitute capacity provided for the planned outages – and will not grant the outage if there is not sufficient capacity. Under this option, a planned outage without substitute capacity may or may not be granted.

Option 2 is that the CAISO will require that substitute capacity be provided for *all* planned outages.

The CAISO also expressed concern about generators taking as forced outages planned outages they submitted but were rejected.

In MRP’s experience, the CAISO’s planned outage assessment process is problematic. The current process provides very little certainty with regards to (1) a

¹⁴ 3RSP at page 42.

generator's ability to take planned outages in the relatively far-forward time frame in which outages must be planned for and scheduled or (2) the amount of substitute capacity that the generator must provide to take the outage.¹⁵ Both of these things are serious impediments to conducting the needed maintenance in a cost-effective way. MRP acknowledges the CAISO's concern about generators taking rejected planned outages as forced outages but offers that the considerable uncertainty around the planned outage process contributes to this dynamic.

The CAISO appears to be torn regarding amending its planned outage process. MRP believes the planned outage process warrants remediation but does not have a specific remediation proposal to offer now. With regards to the CAISO's proposed options, MRP sees Option 2 as very costly and does not prefer it.

MRP urges the CAISO to work towards a planned outage assessment process that incorporates the CAISO's six principles above, plus these things:

- It approves planned outages – even some, if not all - as far forward as possible.
- To the extent that the CAISO cannot advance the time at which it approves the planned outage, the process should allow the generator owner to gain some advanced idea as to the likelihood of their planned outage being approved (e.g., the planned outage is in order X of Y outages submitted for that period).

MRP notes that the CAISO's proposal to identify the amount of "headroom" across a month would also help generators understand where they stand relative to the CAISO's possible approval of their planned outage. The CAISO could consider posting other information that would help resource owners plan outages, such as the MW of planned outages approved from similar past periods.

- The CAISO should, where possible, facilitate provision of substitute capacity (to that end, MRP supports the CAISO's proposed bulletin board for substitute capacity).

MRP acknowledges that this is a difficult and complicated issue and looks forward to working with the CAISO to reform the planned outage process to the market's, and the CAISO's, collective benefit.

- **Short-term opportunity outages**

The CAISO proposes to retain short-term opportunity outages in a modified form: generators may seek a short-term opportunity outage only after the day-ahead market has cleared and the generating unit was

¹⁵ As MRP noted in earlier comments, MRP's experience is that the amount of planned outage substitution required can change daily through the end of the planned outage. See, e.g., MRP's February 6, 2019 comments on the Resource Adequacy Enhancements Straw Proposal Part 1 at page 2; MRP's March 20, 2019 comments on the Resource Adequacy Enhancements Straw Proposal Part 2 at page 3.

not given any day-ahead awards. If approved, such outages, which are limited to a single day, will not require substitute capacity. MRP presumes that such short-term outages will not be considered forced outages and requests the CAISO confirm that presumptions.

Currently, generators may seek short-term opportunity outages for a weekend, when operating conditions are similar and loads are lower. In MRP's estimation, this process has worked well, and MRP is reticent to change it. MRP urges the CAISO to consider how it might allow for short-term opportunity outages that span more than a single day.

- **RA Imports**

While the 3RSP indicates that the CAISO will require that non-specified RA imports identify only the source Balancing Authority Area ("BAA"), the CAISO, at the January 2020 working group meetings, suggested that it was reconsidering whether to require that RA imports be resource-specific. MRP strongly supports the CAISO requiring RA imports to be resource-specific. Such a requirement will not only help ensure that RA imports are neither speculative supply nor double-counted, but will help ensure that the RA import has secured firm transmission to the CAISO delivery point – something that may not be possible if the RA import supplier identifies only the source BAA. Requiring RA imports to be resource-specific would also facilitate RA imports submitting three-part bids to the CAISO's market optimization like internal resources. Finally, requiring RA imports to be resource-specific would "level the playing field" for internal and external RA resources. MRP appreciates that the CAISO is reconsidering its position on RA imports and, for all of the reasons listed above, respectfully urges the CAISO to require that RA imports be resource-specific.

Please provide your organization's position on the System Resource Adequacy topic as described in section 5.1. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

Evaluating

2. Flexible Resource Adequacy

Please provide your organization's feedback on the Flexible Resource Adequacy topic as described in section 5.2. Please explain your rationale and include examples if applicable.

- **EFC as a fifteen-minute product**

The CAISO has proposed that, to align with the imbalance reserve product proposed in the Day-Ahead Market Enhancements initiative, the CAISO will calculate a

resource's Effective Flexible Capacity ("EFC") using the largest range a resource can move over [a] 15-minute interval capped at the resource's UCAP.¹⁶

The CAISO also proposes that, to ensure the CAISO has access to the resource's "best" 15-minute ramping capability, resources that provide flexible capacity will have to economically offer their entire operating range above Pmin. MRP notes that this proposed MOO, from a practical standpoint, does not differ much than determining a resource's flexible capacity across a three-hour period and requiring the resource owner to offer economic bids for that amount of flexibility..

It is difficult to design a single flexible capacity product, focused on a single duration, that meets all the CAISO's needs. The CAISO must be able to meet both the three-hour net load ramp as well as large single-hour ramps. Given the history of this issue and the cool reception given the CAISO's initial proposal for three separate ramping products, MRP understands the CAISO's focus on a single duration product. MRP is still considering whether the 15-minute product is the right single-duration product.

The viability of the CAISO's flexible RA proposal, which focuses on a short-duration product, depends on the successful implementation of the CAISO's Day-Ahead Market Enhancements ("DAME") initiative, which includes the DAIR product. MRP has expressed support for the DAME concept, but significant work remains to finish that product's design and implement it. MRP does not at this time oppose the CAISO's proposal to reform the flexible RA product, but, given the linkage to the DAME initiative, which remains in progress, cannot yet fully support it, either.

- **EFC for wind and solar resources**

MRP appreciates that the CAISO is no longer proposing an EFC counting rule for solar resources.¹⁷ Instead, the CAISO seeks feedback as to which of the following options is preferred:

1. Limits on the amount of flexible RA that can be shown from solar resource[s]
2. Creating a separate flexible RA product that would have a more limited availability

MRP remains skeptical about counting on resources with significant dispatch restrictions to provide dependable flexibility without imposing significant conditions on how those resources can provide flexibility. The amount of flexibility that variable energy resources can provide ties not only to their available energy production (which varies across the day and with weather conditions), but also to whether the resource's output can be curtailed or ramped up – either pre-curtailed to be able to provide upward flexibility, or curtailable in order to provide downward flexibility. A variable energy resource whose contractual terms do not allow it to be pre-curtailed cannot be

¹⁶ 3RSP at page 75.

¹⁷ 3RSP at page 76.

counted on to provide upward flexibility, and a resource whose contractual terms limit its ability to be curtailed cannot be counted on to provide downward flexibility. MRP believes that additional discussion about the conditions that must be imposed in order to allow variable resources to provide flexibility is warranted before MRP can opine on the CAISO's proposed options.

- **Flexible capacity requirement**

The CAISO has proposed a single flexible capacity requirement equal to the historic forecasted net load error between IFM and FMM plus a growth factor to account for additional growth in uncertainty.¹⁸ Later, the CAISO proposes to use three years of historic data to determine both the maximum difference between the day-ahead and fifteen-minute market forecasts and the rate that difference is changing.¹⁹ From these two things, MRP assumes the CAISO will set the flexible capacity requirement at the *maximum* forecasted net load error between IFM and FMM.

- **Operationalizing storage resources**

MRP agrees with other stakeholders that this discussion should take place in the ESDER initiative.

Please provide your organization's position on the Flexible Resource Adequacy topic as described in section 5.2. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

Evaluating

3. Local Resource Adequacy

Please provide your organization's feedback on the Local Resource Adequacy topic as described in section 5.3. Please explain your rationale and include examples if applicable.

The CAISO's proposal remains unclear. The proposal states "LSEs' individual compliance in meeting their given local allocation is calculated in UCAP (for compliance with ISO Tariff sections 43A.8.1 and 43A.8.2)."²⁰ But the proposal also indicates that the CAISO will still evaluate compliance with local area requirements on an NQC basis.²¹

¹⁸ 3RSP at page 72.

¹⁹ 3RSP at page 73.

²⁰ 3RSP at page 80.

²¹ 3RSP at pages 78-79 ("The CAISO has continued to explore both options put forward in the Second Revised Straw Proposal and determined that the option of running the local studies using UCAP values in the study instead of NQC is not aligned with any of the CAISO's other mandatory processes.") Also 3RSP at page 80 ("As all RA showings will be made in terms of UCAP, the CAISO will convert UCAP values back

While the CAISO provided a formula as to how it intends to determine UCAP responsibility by multiplying the TAC-wide NQC requirements by the ratio of TAC-wide UCAP values to TAC-wide NQC values, the CAISO did not provide any numerical examples. MRP respectfully requests the CAISO provide detailed numerical examples (such examples should be as simple as practical, but should include multiple local areas within a given TAC) as to how it intends to conduct this evaluation and TAC-wide UCAP assessment. MRP encourages the CAISO to develop examples with a wide range of UCAP to NQC ratios in different local areas to demonstrate how its proposal will ensure adequate amount of capacity under a wide range of conditions.

Please provide your organization's position on the Local Resource Adequacy topic as described in section 5.3. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

Evaluating

4. Backstop Capacity Procurement Provisions

Please provide your organization's feedback on the Backstop Capacity Procurement Provisions topic as described in section 5.4. Please explain your rationale and include examples if applicable.

The CAISO proposes to expand its authority to issue backstop capacity designations for collective UCAP deficiencies but not for LSE-specific UCAP deficiencies. In other words, the CAISO will not issue backstop designations when individual LSEs have not procured their UCAP requirements but, collectively, enough UCAP has been procured. Instead, the CAISO also proposes to levy LSE-specific charges for LSEs that are short UCAP and to pass those penalty collections to LSEs that are long UCAP.

The CAISO's proposal to establish a mechanism to encourage LSEs that are long UCAP to show that excess UCAP is similar to the CAISO's current system to reward availability above the RAIM target. Under the RAIM mechanism, the CAISO collects penalties for generating unit availability below the availability target and allocates those collected penalties to generating units with availability above the availability target. This self-funding mechanism, however, rewards superior availability only to the extent that the CAISO has collected RAIM penalties from underperformers. Whether the proposed mechanism will create the needed incentives to show excess UCAP will depend on to what extent the payouts to LSEs

into NQC values and run its compliance studies of all RA showings with local technical criteria and requirements using NQC values, as done today" and "Therefore, collective deficiencies will be defined as both insufficient MW of NQC to meet the LCR as well as the existing insufficiently effective capacity.")

that are long UCAP are funded by payouts from those LSEs that are short UCAP. MRP requests the CAISO provide information on how the self-funding RAAIM mechanism has worked in the past (e.g., aggregate information on penalties and incentive payouts) to help inform market participants' thinking about this mechanism.

MRP reiterates that a necessary corollary to the CAISO's UCAP proposal that if the CAISO issues a backstop designation to secure an amount of UCAP, it must issue (and compensate) that designation for associated amount of NQC.

- **RMR Availability Incentives.**

If the CAISO eliminates RAAIM, MRP urges the CAISO to re-instate the original unit-specific availability provisions in the RMR Agreement.

Please provide your organization's position on the Backstop Capacity Procurement Provisions topic as described in section 5.4. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

Support with caveats

Additional comments

Please offer any other feedback your organization would like to provide on the Resource Adequacy Enhancements third revised straw proposal.