



Stakeholder Comments Template

Flexible Ramping Product Refinements Issue Paper/Straw Proposal

This template has been created for submission of stakeholder comments on the **Flexible Ramping Product (FRP) Refinements issue paper/straw proposal** that was posted on November 14, 2019. Information related to this initiative may be found on the initiative webpage at: <http://www.caiso.com/StakeholderProcesses/Flexible-ramping-product-refinements>.

Upon completion of this template, please submit it to initiativecomments@caiso.com by close of business on December 5, 2019.

Submitted by	Organization	Date Submitted
<i>Ryan Millard (Ryan.Millard@pgn.com), 503-464-7271</i>	<i>Portland General Electric</i>	<i>12/05/2019</i>

Please provide your organization's comments on the following topics as discussed in the paper/proposal, including your positions on the proposed solutions (i.e., support, support with caveats, oppose, oppose with caveats). When applicable, please provide detailed examples to explain your organization's positions.

PGE General Comments:

PGE appreciates the opportunity to comment on the CAISO's Flexible Ramping Product Refinements Issue Paper and Straw Proposal. PGE supports of CAISO's overall effort to refine the flexible ramping product and to address uncertainty that materializes between market runs. Additionally, the scope of the proposed flexible ramping product refinements should be expanded, and PGE supports PacifiCorp's comments regarding the need for the CAISO to incorporate forecast levels of load, wind and solar in the determination of the real-time flexible ramping requirement.

With respect to the items listed in CAISO's Issue Paper, PGE strongly encourages CAISO to schedule a separate workshop (or series of workshops) to more fully examine the proposed changes to Proxy Demand Eligibility, Ramp Management, and the Minimum FRP requirements that CAISO intends to address through the existing BPM change management process.

It is PGE's experience that through the BPM change management process the CAISO is often implementing revisions that have been well vetted through more extensive stakeholder processes. The final proposals for the topics put forward by the CAISO in its Issue Paper/Straw Proposal will benefit

from additional stakeholder dialogue that is more extensive than the standard BPM change management process.

For example, it is not clear to PGE how the CAISO plans to address uncertainty that might materialize between two FMM runs if 100% of the FRP up award is maintained in the buffer interval, or what infeasibilities may result from doing so? In the stakeholder meeting on November 21st, the CAISO acknowledged that it was still looking into this but to better facilitate stakeholder feedback and to address technical questions that may arise from the CAISO's analysis, PGE strongly encourages the CAISO to schedule a separate workshop to walk through proposed changes to Proxy Demand Eligibility, Ramp Management, and the Minimum FRP requirements that the CAISO intended to address through the existing BPM change management process. This workshop would include examples from the CAISO's analysis, allow stakeholders to ask outstanding questions, and would also allow for stakeholders to provide more input in a transparent and collaborative manner without compromising the CAISO's projected timeline.

1. Proxy demand response eligibility (section 2):

Support, with caveats highlighted under PGE's general comments.

2. Ramp management between fifteen minute market and real-time dispatch (section 3):

Support, with caveats highlighted under PGE's general comments.

3. Minimum FRP requirement for CAISO (section 4):

Support, with caveats highlighted under PGE's general comments

4. Deliverability enhancement (section 5 – 5.2):

- **Zonal vs. nodal procurement.**

Please provide comments on both pros/cons discussed in the paper.

PGE appreciates the CAISO's acknowledgement that the zonal and nodal considerations of FRP procurement should align with the methodology that is implemented for the day-ahead imbalance reserve product. To that end, PGE supports the recommendations that have been made by others that CAISO consider the aims of the Day Ahead Market Enhancements initiative in their continued analysis to ensure the continuity of both policy processes.

5. EIM Governing Body classification (section 6.2):

Support.

6. Additional comments:

PGE thanks the CAISO for the opportunity to provide these comments and looks forward to reviewing the next iteration of its proposal.