



Stakeholder Comments Template

RA Enhancements

This template has been created for submission of stakeholder comments on the straw proposal part two that was published on February 28. The paper, 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 March 20.

Submitted by	Organization	Date Submitted
<i>Daniel Richardson (530) 713-5175</i>	<i>Wellhead Electric Comapany</i>	<i>March 20, 2019</i>

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

1. Review of counting rules in other ISO/RTO’s

As Wellhead has previously noted, any enhancements to the Resource Adequacy program need to be made with consideration of the impact to existing long-term RA contracts (and/or long-term tolling contracts with RA features). Such contracts have pricing and terms which were developed based upon current (or previous) RA counting rules, and changes should not be made to the counting rules which will result in disruptions to those long term contracts. The current proposal to utilize a UCAP for planning purposes may be a reasonable planning tool for the CAISO, provided that the UCAP does not become the defacto contractual NQC, whether directly or indirectly.

2. Capacity counting and availability best practices

Please provide your organization’s feedback on this topic, described in section 4.2. Please explain your rationale and include examples if applicable.

Using a UCAP to establish the Planning Reserve Margin (“PRM”) in the backstop assessment may be a valuable tool for grid planning; however, allowing the UCAP to affect future, unit-specific RA “showings” will cause major contractual disruptions that could not have been foreseen at the time of contract execution and therefor were not

considered in existing (or soon to be entered into) RA contracts. Wellhead seeks additional clarity which would include examples of how UCAP will be used so that market participants can properly assess if there is a potential for any contractual issues.

3. RA counting rules and assessment enhancements

Please provide your organization's feedback on the following sub-section topics, described in section 4.3.

Please indicate any analysis and data review that your organization believes would be helpful to review on the this topic. Please provide details and explain your rationale for the type of data and analysis that you suggest.

- a.** Calculating NQC, UCAP, and EFC values topic, described in section 4.3.1.

Provided that the UCAP is only used to establish the PRM in the backstop assessment, Wellhead supports the calculation of the NQC, UCAP, and EFC at this time, subject to further, forthcoming information from the stakeholder process.

- b.** Determining System, Local, and Flexible RA requirements topic, described in section 4.3.2. Please explain your rationale and include examples if applicable.

- c.** RA showings, supply plans, and assessments topic, described in section 4.3.3. Please explain your rationale and include examples if applicable.

- d.** Backstop capacity procurement topic, described in section 4.3.4. Please explain your rationale and include examples if applicable.

4. Review of RA import capability provisions

Please provide your organization's feedback on the following sub-section topics, described in section 4.4.

Please indicate any analysis and data review that your organization believes would be helpful to review on the this topic. Please provide details and explain your rationale for the type of data and analysis that you suggest.

- a.** Maximum Import Capability Calculation review, described in section 4.4.1. Please explain your rationale and include examples if applicable.

- b. Available Import Capability Allocation Process review, described in section 4.4.2. 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 two.