



Stakeholder Comments Template

Flexible Ramping Product Refinements Initiative

This template has been created for submission of stakeholder comments on the revised straw proposal that was published on March 16, 2020. The proposal and other material related to the Flexible Ramping Product Refinements (FRPR) initiative may be found on the ISO website at: <http://www.caiso.com/StakeholderProcesses/Flexible-ramping-product-refinements>.

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on April 6, 2020.

Submitted by	Organization	Date Submitted
<i>Ryan Millard (ryan.millard@pgn.com)</i>	<i>Portland General Electric Company</i>	<i>4/06/2020</i>

Please provide your organization’s overall position on the FRPR revised straw proposal:

- Support
- Support w/ caveats
- Oppose
- Oppose w/ caveats
- No position

Please provide written comments on each of the revised straw proposal topics listed below:

1. Proxy Demand Response Eligibility:

PGE supports the CAISO’s proposal to modify the default setting for Proxy Demand Response Eligibility to 60-minute dispatchable, as this setting more accurately accounts for the limitations of most PDR resources to respond to 5-minute dispatch instructions.

2. Ramp Management between fifteen minute market and real-time dispatch:

The CAISO did not provide any additional detail (or propose changes) to their original proposal to maintain a portion of the FRP awards, up to 100%, in the buffer interval for the RTM run that were procured in the prior FMM to ensure ramping capability is preserved for the RTD.

Previously, PGE requested that CAISO provide additional analysis regarding how the CAISO plans to address uncertainty that might arise between two FMM runs when 100% of the FRP up award is maintained in the buffer. This request was further supported in the comments of Powerex who suggested that CAISO perform an analysis to separate the total uncertainty requirements into two components:

- *Uncertainty that generally materializes between the advisory FMM and the buffer interval; and*
- *Uncertainty that generally remains between the buffer interval and the maximum/minimum binding RTD run.¹*

In the absence of such an analysis, it remains unclear to PGE what the appropriate quantity of FRP to enforce in the buffer interval should be and PGE strongly encourages the CAISO to include additional detail of this consideration in the next iteration of their proposal.

3. Minimum Flexible Ramping Product Requirement for BAA:

PGE requests additional information regarding how the minimum FRP is calculated for the CAISO BAA. In the excel spreadsheet that CAISO staff provided as part of the stakeholder presentation, PGE notes that any increase in MWs to the EIM Area Requirement (Column A) will result in an overall higher proposed EIM requirement. Moreover, the Diversity Benefit MW amount per BAA (Column F) simultaneously increases for each BAA. What remains unclear to PGE, however, is why increases in those cells result in a net decrease to the CAISO BAA minimum requirement (Column G)? If the CAISO BAA is part of the EIM footprint, why would any increase in the EIM area requirement result in a lower minimum requirement for the CAISO BAA?

4. Nodal Procurement:

PGE supports the nodal approach for procuring FRP. Consistent with the comments of other stakeholders and the complexities associated with this proposal, however, PGE encourages the CAISO to outline what alternatives the CAISO will take should the implementation of this proposal fails? As noted by other EIM entities, if a zonal approach is developed as an alternative then the CAISO will need to work closely with each entity to determine the appropriate zonal boundaries in each EIM entity BAA.

¹ Comments of Powerex Corp. on Flexible Ramping Product Refinements Straw Proposal, December 5, 2019.

5. FRP Demand Curve and Scarcity Pricing:

Support

6. Scaling FRP Requirements:

Support

7. EIM Governing Body Categorization – Advisory Role:

Support

8. Additional comments:

Given the technical complexity of this initiative and the potential for additional questions regarding how each of these proposals are implemented, PGE is concerned that the CAISO's decision to process these changes through the CAISO's existing BPM change management process unnecessarily limits the amount of stakeholder discussion needed to vet the CAISO's proposals. While PGE is supportive of the direction that the CAISO has taken in refining the flexible ramping product, it is critical that stakeholders understand the practical application of these changes prior to the CAISO drafting any BPM language. The CAISO's technical document (while detailed) still leaves PGE with a number of questions. As such, PGE would like to reiterate our previous comments regarding the need to supplement the BPM change management process with additional examples and analysis.