

DOCKETED

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Seattle's ISO WSC Comments

Additional submitted attachment is included below.

Optional Stakeholder Comments Template

Western States Committee (WSC) Primary Authority Discussion Paper

Submitted by	Organization	Date Submitted
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Stakeholders are encouraged to use this template to provide comments on the *Potential Topics within the Primary Authority of the Western States Committee* Discussion Paper and Draft Proposal posted on October 7, 2016.

All documents for the Regional Grid Operator and Governance Proceeding are available at:

http://www.energy.ca.gov/sb350/regional_grid/documents/index.html

Submit comments to the California Energy Commission Docket 16-RGO-01:

<https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=16-RGO-01> or
docket@energy.ca.gov

Comments should be submitted by October 31, 2016.

1. Please indicate your organization's overall level of support for the ISO's proposal regarding potential topics for the primary authority of the WSC.

To indicate level of support, please select one of the following options: (1) Fully support; (2) Support with qualification; or, (3) Oppose. Please provide an explanation of your organization's position. (For example, if your organization fully supports, please provide reasons for your support. If your organization supports with qualification, please describe your qualifications or specific modifications that would allow you to fully support the proposal. If your organization opposes, please explain why you oppose the proposal.

2 – Support with qualifications

Seattle supports the general approach adopted by the October 7, 2016 draft. However, the ISO should recognize that the ability of any entity to support the proposed WSC construct and the currently identified areas of primary authority is also interdependent upon the outcome of the on-going Transmission Access Charge (TAC) and Regional Resource Adequacy (RRA) stakeholder processes.

Similarly, careful consideration should be given to the probability that the issues within the primary authority of the WSC will need to evolve over time in response to changing legal, regulatory and operational needs. Seattle recommends that the current proposal be seen as an initial starting

point that reflects the best thinking of ISO's staff, the various affected states and entities, while also recognizing that there will almost certainly be a future need for evolution. The governing documents of a regional ISO should reflect and provide for this form of future evolution.

2. The ISO's discussion paper identified at page 5 certain factors that may be relevant in establishing whether a particular topic within the categories of Resource Adequacy or transmission cost allocation should be within the primary approval authority of the WSC. Please provide any comments you may have on whether the factors that have been identified are the correct ones or if other factors or criteria should be considered.

See comment above and the Resource Adequacy comments filed concurrently with the CAISO.

3. The ISO's discussion paper identifies the system wide planning reserve margin target as a topic within RA that should be within the primary approval authority of the WSC. Please comment on this aspect of the proposal. Please also comment on whether there are any other specific topics within the category of RA for which the WSC should have primary approval authority.

See comment above and the Resource Adequacy comments filed concurrently with the CAISO.

4. The ISO's discussion paper identifies as a topic for the WSC's primary approval authority cost allocation between sub-regions for policy driven projects that support policy mandates of, or provide benefits to, more than one sub-region. Please comment on this aspect of the proposal. Please also comment on whether there are any other specific topics within the category of RA for which the WSC should have primary approval authority.

Seattle respectfully suggests that careful consideration of transmission cost allocation should include protection for current or potential future sub-regions that would not benefit from a proposed project, whether reliability, policy or economically driven.

5. Please comment on any other topics that your organization feels should be included in this proposal.

Seattle supports the proposal in section 4.1.2 that would clarify that participation in the WSC process does not bind a given state or local regulatory authority to take a given position in other legal or regulatory proceedings, including but not limited to the ISO's own proceedings.