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Subject: Vistra Comments: Capacity Auction Reforms Project
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Hi James,

Please see below Vistra's comments on the CAR scope of work:

Vistra appreciates the opportunity to comment on ISO-NE's draft scope of work for the Capacity Auction Reforms ("CAR") project and looks forward to working with ISO New England as they advance a new capacity market design for FCA 19.

The accreditation techniques that ISO has discussed with NEPOOL stakeholders over the prior two years have highlighted the need to qualify resources based on their expected contributions to reliability, and not based on how 'large' the size of the resource is, (*i.e.*, by its Qualified Capacity value). Vistra asks the ISO to consider a reasonable expectation of resource energy delivery (hourly, seasonally etc.)— *for all resource types and classes, including RMRs and tie benefits* - when developing a capacity accreditation value for a participating resource.

Vistra appreciates the opportunity to submit comments on the initial scope of the project and looks forward to working with ISO as they develop the details of the proposal in coming months.

Ryan

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