CALWEA Comments received from S. Schnieder 6/26/09

**GENERAL:** We continue to believe that these documents should be combined, so one need not look in two places to get the total requirements for EIRs. It will be extremely confusing for one document to contain requirements for "EIRs," while another states various provisions of the first that do or don't apply to non-PIRP EIRs (third paragraph of p.2 of the outage-reporting document).

The remaining comments are based on the CalWEA list I sent you on May 5th (attached for your convenience). While I appreciated the call this afternoon, unfortunately most of our recommendations were not incorporated.

**PIRP WIND SPECS:** These changes we recommended were not incorporated:

- **Backup power source clarifications:** Clarify that the back-up source for the met stations can be shared between stations.

- **Height of the second met station:** Clarify that this station need not be at “hub height” (e.g., the ISO models can use ratios to estimate actual hub-height metrics).

- **Effective date of the new rules:** (1) Generally, clarify that this would be when FERC rules on an ISO Tariff amendment filing to implement the proposed changes; (2) clarify that current PIRP plants would have up to 6 months after that date to comply. (The "6 months" is mentioned in footnote #8, but the document does not specify when the 6 months would start.)

**PIRP OUTAGE-REPORTING PAPER:** These changes we recommended were not incorporated:

- **PIRP outage reporting**
  - **Applicable situations**
    - Clarify that the proposal would apply to equipment availability only, not wind conditions at any given time, like current SLIC outage reporting.
    - Provide that units below 10 MW (exempt from current Availability Reporting requirements in SLIC) would be exempt from the new requirements.
    - Address NextEra/EON/Iberdrola proposal that ISO use a minimum-outage threshold of either 10 MW or a percentage of plant capacity (10% example given by both), to reduce the burden on large plants.

- **Applicability of most PIRP provisions to non-PIRP EIRs**
  - **Exemptions for older plants generally:** Clarify that older plants not in PIRP would not be required to install additional equipment but must provide the information they can with existing equipment, i.e., that they are not required to:
    - Install met stations if they currently have none, or install additional equipment in any current met stations they may have; or
    - Comply with the more-granular outage requirements if they have no or non-functional SCADA systems.

  - **Outage-reporting threshold:** Provide that units below 10 MW (exempt from current Availability Reporting requirements in SLIC) would be exempt from the new requirements.

  - **Imposition of PIRP fees on non-PIRP plants:** Withdraw proposal to impose PIRP fees on non-PIRP plants, pending ISO consideration of a broader examination of its policies on separate fees for services.

The problems with the PIRP wind specs mainly require clarification. The problems with the outage-reporting and non-PIRP provisions are more serious and substantive, and I am hoping that there is still an opportunity to make these changes, so we can avoid the need to protest the ISO proposals at the Board and at FERC.