

**Comments on  
CAISO's September 26, 2019  
Commitment Cost Enhancements Phase 3 (CCE3)  
Draft Tariff Clarification Language**

October 14, 2019

CDWR would like to submit the following comments:

1. Please confirm that hydro generation and pumping load that is use-limited and used for RA capacity will remain exempt from the requirement to submit RUC Availability Bids. It appears that based on existing tariff sections 30.7.3.1, 31.5.1.1, and 40.6.4, this protection is implied. Would reference to "any Bid" in Section 30.7.3.1 include RUC bids?

30.7.3.1 – "... The CAISO will not insert or extend any Bid for a Resource Adequacy Resource that is a Use-Limited Resource."

31.5.1.1 – "RUC participation is voluntary for capacity that has not been designated as Resource Adequacy Capacity. ...."

40.6.4 – titled: "Availability Requirements for Resources with Operational Limitations that are not Qualified Use-Limits"

2. DWR believes that the existing language in Tariff Section 40.6.8 (e) is confusing and suggests the following language as a replacement:

....

(e) **Exemptions.** The following resource types are exempt from RA Capacity bid insertion: Use-Limited Resource, Non-Generator Resource, Variable Energy Resource, Hydroelectric Generating Unit, Proxy Demand Resource, Reliability Demand Response Resource, Participating Load, including Pumping Load, Combined Heat and Power Resource, Conditionally Available Resource, and resources providing Regulatory Must-Take Generation.