

## Implementation of PRR 1280 Executive Appeals Committee Decision

*On December 9, 2020, the Executive Appeals Committee issued a written decision about appeals of Proposed Revision Request (PRR) 1280 to the ISO's Business Practice Manual (BPM) for Reliability Requirements.<sup>1</sup> PRR 1280 addressed how the ISO would process Resource Adequacy credits provided by Local Regulatory Authorities (LRA). The Committee's decision holds PRR 1280 in abeyance "until the Committee renders a future decision on the appeals on or after August 1, 2021." Stakeholders have raised several questions about how the ISO will implement the decision. This document outlines some frequently asked questions and offers answers.*

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**Q: What does the August 1, 2021, date mean?**

None of the PRR 1280 amendments will go into effect without an additional decision from the Appeals Committee. Based on the December 9 decision, August 1 is the earliest date that the Appeals Committee would make such a decision. The Appeals Committee will hold a public meeting as soon as possible after August 1 to consider further actions.

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**Q: How will the ISO communicate further decisions about what happens on or after August 1, 2021?**

The ISO will keep stakeholders informed about additional developments through notices and other outreach.

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**Q: What happens with the BPM language between now and August 1, 2021?**

The BPM change management system will continue to reflect an "Appeal Pending" status for PRR 1280. The ISO also has submitted an emergency PRR (PRR 1316) to amend the Reliability Requirements BPM to note the Committee's decision has held the PRR 1280 amendments in abeyance.

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**Q: While PRR 1280 is in abeyance, what will the ISO do about notices to Local Reliability Authorities (LRA) and Load Serving Entities (LSE) if Resource Adequacy (RA) Plans do not demonstrate sufficient RA Capacity to meet all applicable RA requirements?**

The ISO must notify LSEs and LRAs when a RA Plan has not demonstrated sufficient "Resource Adequacy Capacity" to meet all applicable requirements. Until further action by the Executive Appeals Committee regarding PRR 1280, the ISO will provide such notifications based solely on RA Capacity shown on Supply Plans.

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<sup>1</sup> Full decision document available at:  
<http://www.caiso.com/Documents/ExecutiveAppealsCommitteeDecision-PRR1280-Dec092020.pdf>

**Q:** How will the ISO assign planned outage substitution obligations while PRR 1280 is in abeyance?

While PRR 1280 is in abeyance, the ISO will assign planned outage substitution obligations considering RA Capacity on Supply Plans and credited capacity.

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**Q:** As a technical issue, how will the ISO implement the Committee's decision?

During the period PRR 1280 is in abeyance, LRAs can provide their credits, including for demand response, through Customer Inquiry, Dispute and Information (CIDI). Purely as a systems implementation issue, the ISO will not load the credits before RA Plans and Supply Plans are initially due at T-45. The ISO will, however, load them to Customer Interface for Resource Adequacy (CIRA) as soon as possible after T-42 and no later than T-35. One impact of this approach is LSEs counting on their allocation of Cost Allocation Methodology credits to meet their RA requirements may receive notices of insufficient RA Capacity when they have not received such notices in the past. The credits will, however, be reflected in CIRA at least five days before expiration of the cure period.

LRAs should include the phrase "RA Credits" in the subject line of their CIDI case so it gets processed expeditiously.

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**Q:** For 2021 RA processes that have already taken place, what will the ISO do about rejected credits or credits that an LRA would have submitted if PRR 1280 had not been in effect?

LRAs may use CIDI to resubmit RA credits for the 2021 RA processes that already have occurred.

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**Q:** How does the Committee's decision impact the slow demand response initiative?

LRA-approved capacity credits supported with demand response resources with slow response times will be treated as all other credits under the Committee's decision.

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