



January 11, 2018

***Via U.S. Mail and Electronic Mail***

Energy Division  
Attention: Tariff Unit  
California Public Utilities Commission  
505 Van Ness Avenue,  
San Francisco, CA 94102  
Email: [edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

**Re: California Independent System Operator Corporation Comments on Draft Resolution E-4907**

Dear Energy Division:

The California Independent System Operator (CAISO) submits these comments in response to the California Public Utilities Commission's (Commission's) Draft Resolution E-4907 (Draft Resolution). The Draft Resolution seeks to publish and implement a registration process for Community Choice Aggregators (CCAs).

The Draft Resolution should ensure that any process and timeline change is coordinated with the California Energy Commission (CEC) and the CAISO. The resource adequacy (RA) program is a critical and integral part of the CAISO's ability to operate the grid reliably. There are a variety of requirements and responsibilities that all LSEs must meet in order to participate in the CAISO markets. For example, all LSEs must be represented by a qualified Scheduling Coordinator to engage with the CAISO. Moreover, if the LSE has an RA obligation, such as the case with CCAs, there are additional requirements to ensure that this is appropriately reflected in CAISO's systems and coordinated with other agencies. For example, the load migration information used by the CAISO comes from the CEC and must be entered into the CAISO system so that RA showings and must offer obligations are enforced.

Respectfully submitted,

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Service Lists: R.03-10-003; R.17-06-026; R.17-09-020; R.16-02-007