

STAKEHOLDER COMMENTS ON DRAFT PDR TARIFF LANGUAGE

Company	Comments	Related Tariff Section	Date of Comments	CAISO Response to Comments
PGE	There is a missing “J” at the end of this section.	4.5.1.1.3	12/1/09	We have corrected this.
PGE	<p>The need for improved Tariff clarity is further required since section 4.5.1.1.3 seems to indicate that such agreements are <i>not</i> necessary. This sections states: <i>Nothing in this Section 4.5.1.1.3 or any other provision of the CAISO Tariff shall prohibit one Scheduling Coordinator from registering with the CAISO to submit Bids for Demand Response Services from a Proxy Demand Resource associated with a given meter [or Meter Point] where a different Scheduling Coordinator is registered for Load associated with that meter [or Meter Point].</i></p> <p>The design and support of PDR by PG&E and others was premised on a number of integrated features that must be adopted into the tariff as a whole and complete package.</p>	4.5.1.1.3	12/1/09	<p>PDR agreement must be in place prior to initiating the registration of a PDR. The metering BPM will have more detail on registration requirements.</p> <p>The ISO will consider removing the new language “or any other provision of the CAISO Tariff” to ally the concern that this tariff section would somehow allow a PDR resource to be established without other requirements being met that are spelled out in other sections of the Tariff.</p>
PGE	<p>PG&E assumes that the purpose of this language is to allow the DRP SC to be different from the LSE SC for a given meter. We would like to clarify the tariff language to ensure that it only applies to an existing approved PDR.</p> <p>4.5.1.1.3 Duplicate Information</p>	4.5.1.1.3	1/26/10	See above response

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	<p><i>...Nothing in this Section 4.5.1.1.3 or any other provision of the CAISO Tariff shall prohibit one Scheduling Coordinator from registering with the CAISO to submit Bids for Demand Response Services from an approved Proxy Demand Resource associated with an approved given meter (or Meter Point) where a different Scheduling Coordinator is registered for Load associated with that meter (or Meter Point).</i></p>			
PGE	<p>PG&E believes that there could be potential gaming opportunities as a result of the interaction between the CRR allocation process and the dispatch of PDR.</p> <p>4.10.3.3 Proxy Demand Resources and the Congestion Revenue Right Allocation Process</p> <p>Proxy Demand Resources are prohibited from acting as a source or a sink in any phase of the Congestion Revenue Right Allocation processes.</p> <p>PG&E believes that it is important that LSEs and UDCs have the right to reject the registration of a customer service account that a DRP wishes to include in a PDR. However, PG&E understands</p>	Proposed New Section 4.10.3.3	1/26/10	The CAISO is considering adding an exclusion to section 36.8.4 (Eligible Sources for CRR Allocation) to prohibit PDRs as CRR Sources. Pursuant to the existing Section 36.8.2, PDRs are not eligible as CRR Sinks

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	that the LRA has jurisdiction over these issues and that the CAISO should not be involved in resolving potential disputes of this nature. We have proposed language that attempts to address this.			
AReM	This section leaves the strong impression that Demand Response Providers (DRPs) are required to sign a separate agreement to participate at the CAISO as if they were a separate entity requiring some kind of registration. Also, the defined term in the definitions states that DRPs are required to execute the “applicable” agreement. I understand, however, that electric service providers (ESPs) wishing to set up their own PDRs and who are already their own Scheduling Coordinators (SCs) are not required to sign any additional agreement to become a DRP (except a PDR agreement). It would be good to clarify the specific requirements of a DRP.	4.13.1	12/1/09	<p>The agreement that Section 4.13.11 speaks to is the PDR Agreement—All Proxy Demand resources must be represented by a Demand Response Provider, and all Demand Response Providers must sign a PDR Agreement with the CAISO</p> <p>The section further states that bids must be submitted through an SC.</p>
PGE	Load Serving Entity Agreements – PG&E believes the Draft Tariff inappropriately omits any references to the necessary bilateral agreements between a Demand Response Provider (DRP) and a Load Serving Entity (LSE) to address undue double payment attribute of PDR. PG&E recommends that <i>Section 4.13.1 – Relationship between CAISO and DRP</i> could be expanded to explicitly state such a requirement. Section 4.3 of Appendix B	4.13.1	12/1/09	The ISO is concerned that Local Regulatory Authority requirements may be dynamic or that the Local Regulatory Authority may determine that some other mechanism than a bilateral agreement may be developed, in which case the tariff would be inaccurate and have to be changed. Also, the ISO does not believe that the local regulatory requirements should be stated in the ISO tariff.

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	<p>of the Pro Forma Agreement indicates that the DRP must 'satisfy all applicable rules and regulations of the Local Regulatory Authority'; this provision is not sufficiently explicit to address the need to incorporate the double-payment agreements.</p> <p>As possible changes to address these concerns, PG&E recommends the following tariff additions (changes are in bold):</p> <p>4.13.1 Relationship Between CAISO and Demand Response Providers.</p> <p><i>The CAISO shall only accept Bids for Energy or Ancillary Services, Submissions to Self-Provide Ancillary Services from Proxy Demand Resources or Submissions of Energy Self-Schedules at Pmin from Proxy Demand Resources if such Proxy Demand Resources are represented by a Demand Response Provider that has entered into a Proxy Demand Resource Agreement with the CAISO, has accurately provided the information required in the Demand Response Application, has satisfied all Proxy Demand Resource registration requirements, and has met standards adopted by the CAISO and published on the CAISO Website. The Proxy Demand Resource Registration process will ensure that a registered</i></p>			

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	<p>Proxy Demand Resource has the approval of the load serving entity whose load may be part of an aggregate Proxy Demand Resource prior to participating in the wholesale markets. Since the load is served by the LSE, and the LSE will pay for Day-Ahead power that is not consumed as a result of the dispatch of the proxy demand resource, the LSE has the ability to approve or reject a proxy demand resource registration. The CAISO shall not accept submitted Bids for Energy or Ancillary Services from a Demand Response Provider other than through a Scheduling Coordinator, which Scheduling Coordinator may be the Demand Response Provider itself or another entity.</p>			
SDG&E	<p>It isn't clear to SDG&E why the term Demand Response Services is necessary or how it is distinguishable from the term Curtailable Demand. Further, the definition provided in Appendix A, Master Definitions Supplement, ties it to the definition of Proxy Demand Resource which is bound by the terms of the PDR agreement. Demand Response Services do not seem to have the same commercial or legal relationship with the CAISO as defined.</p>	4.13.2	12/1/09	This definition was included to anticipate the potential that demand response services might affirmatively schedule load instead of merely curtailing load.
PGE	<p>4.13.2 Requirements Applicable to Demand Response Providers and Proxy Demand Resources</p>	4.13.2	1/26/10	

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	<p><i>...Each Proxy Demand Resource is required to be associated with a single Load Serving Entity and for a single Utility Distribution Company. Each Proxy Demand Resource is required to be located in a single Sub-LAP. All underlying Locations of a Proxy Demand Resource must be located in a single Sub-LAP. The Meter Data for each Proxy Demand Resource will be metered Load data. Each Demand Response Provider is required to satisfy registration requirements and to provide information to allow the CAISO to establish Customer Baselines in accordance with the applicable Business Practice Manuals.</i></p> <p>Registration of a Location for participation in Proxy Demand Resources requires the approval of the underlying Loads' Load Serving Entity and Utility Distribution Company. Disputes regarding the rejections of a registration of a Location shall be undertaken with the applicable Local Regulatory Authority and shall not be arbitrated or in any way resolved through a CAISO mechanism or process.</p> <p>PG&E believes that the CAISO will need to develop metrics to actively monitor the behavior of PDRs (as was stated in Section 4.7 of the CAISO's Draft Final</p>			

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	Proposal); this will ensure the legitimacy of a PDR's load reductions. The CAISO should be allowed to investigate and suspend a PDR that (successfully or unsuccessfully) attempts to game the market.			
PGE	<p>4.13.3 Identification of Proxy Demand Resources.</p> <p>Each Proxy Demand Provider shall provide data, as stipulated in the Business Practice Manual, identifying each of its Proxy Demand Resources and such information regarding the capacity and the operating characteristics of the Proxy Demand Resource as may be reasonably requested from time to time by the CAISO. All information provided to the CAISO regarding the operational and technical constraints in the Master File shall be accurate and actually based on physical characteristics of the resources.</p>	4.13.3	1/26/10	
PGE	<p>6.3.1 Scheduling Coordinator Responsibility to Pass Dispatch Instructions to Participating Generator, Participating Load, or Demand Response Provider</p> <p>...The CAISO may, with the prior permission of the Scheduling Coordinator concerned, communicate with and give Dispatch Instructions to</p>	6.3.1	1/26/10	

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	the operators of Generating Units, Participating Loads, and to Demand Response Providers, directly without having to communicate through their appointed Scheduling Coordinator. In situations of deteriorating system conditions or emergency, the CAISO reserves the right to communicate directly with the Generator(s) and Demand Response Providers as required to ensure System Reliability.			
EnerNOC	The language in this section indicates that while CAISO would normally communicate dispatch instructions to the Scheduling Coordinator, who would then be expected to pass the instructions along to the Generator, Participating Load or Demand Response Provider, CAISO reserves the right to communicate dispatch instructions directly to the generators rather than through Scheduling Coordinators or operators of the PDRs. If “generators” here refers to individual resources and means that CAISO would contact individual customers in a PDR directly, this seems problematic. In many, if not most, cases, assets participating in wholesale markets through DR Providers are directly controlled by the DR Provider, so the Provider is the appropriate entity to receive dispatch instructions to ensure system reliability. One other note that is relevant to several sections but first occurs here is that the language seems to switch from “Demand	6.3.1	12/1/09	<p>The language has been revised to replace proxy demand resources with “demand response provider”</p> <p>We have followed the convention of the existing tariff section when using the reference “owner or operator”</p>

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	<p>Response Provider” to “operators of Proxy Demand Resources.” In other places however, the language refers to “owner or operator of Proxy Demand Resources.” This gets a bit confusing in some places. In many cases the owner and operator are different entities. In many cases, the “operator” seems to be the Demand Response Provider, but that doesn’t seem to apply in every instance either. Please clarify whether you intend for these terms to be interchangeable. If not, an additional definition of PDR “operator” may be required to distinguish that from the DR Provider.</p>			
EnergyConnect, Inc.	<p>In Section 8.4.5 (page 14), the obligation to be capable of receiving communications from the CAISO should be limited to the times during which a resource submits bids that might require it to be dispatched. The 24 hour requirement makes no sense if the PDR (or any other resource, for that matter) is only going to be made available between 7 AM and 7 PM, for example.</p>	8.4.5	12/1/09	<p>The CAISO will consider removing the 24 hour requirement for the DRP as long as the SC representing the Proxy Demand Response resource is available 24 by 7.</p>
EnerNOC	<p>If there is an objective other than providing the most reliable communication link possible to justify the requirement that a DR Provider who is offering any Ancillary Service must provide a “direct ring down voice communications circuit between the control room operator for the Demand Response Services and the CAISO Control Center” please provide that</p>	8.4.5	12/1/09	<p>See Comment Above</p> <p>The CAISO will consider whether the requirement can be restated without referencing a technology.</p>

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	clarification on the December 4 stakeholder call. Otherwise, if the objective is to provide the most reliable communication link possible, a ring down line is not the only answer. It is our experience that establishing a regular 24x7 phone line, as DR Providers do in other jurisdictions such as PJM, can be more reliable than a ring-down line. This is because it allows entities to leverage redundant services (control rooms, data centers, phone switches, etc.) instead of relying on the single ring down line. If entities are able to provide that type of communication link, it should be equally acceptable to CAISO.			
PGE	Tariff language inter-mixes the use of 'Demand Response Provider' and 'Proxy Demand Resource' in an inconsistent manner.	6.3.1	12/1/09	In general, the CAISO has followed the convention of the tariff section; in a few instances, we have used Demand Response Provider to clarify that the ISO does not expect to contact the underlying customer.
EnergyConnect, Inc.	In Section 8.9 (there may also be other places), which party bears the obligation if the owner and operator are different entities? There needs to be clarity around this point for PDR and for loads.	8.9	12/1/09	The ISO clarified this by using the phrase "Scheduling Coordinators representing Proxy Demand Resources"
PGE	Why does this tariff section only specify Scheduling Coordinators for PDR and not for Generating units, System resources, and Participating Loads?	8.9	1/26/10	
PGE	There is no mention in this section of the audit required for a PDR or Participating Load.	8.9.14	1/26/10	
EnergyConnect	The language in Section 8.9.3.2 that	8.9.3.2	12/1/09	The ISO replaced Proxy Demand Resource

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t, Inc	allows the CAISO to issue a Dispatch Instruction and requires the operator to provide a report regarding the capability of a PDR is ambiguous and likely not a reasonable way to conduct tests. If, as stated in Section 6.3, Demand Response Providers are responsible for carrying out dispatch instructions, then test dispatch instructions should be issued to the Demand Response Provider rather than the owner or operator. Tests should be conducted by issuing dispatch instructions and observing meter data or telemetry.			with the Demand Response Provider for the reporting obligation.
EnergyConnect, Inc.	In the discussion regarding settlement quality meter data that begins in Section 10.3 (page 22), LSEs must provide either actual or estimated meter data within 5 days, but Demand Response Providers or their Scheduling Coordinator cannot provide estimated meter data. It's not entirely clear that a) Demand Response Providers must provide actual meter data within 5 days, or b) what the consequences are if they don't. Some additional clarity on this point would be helpful. It would also be helpful to clarify precisely which entity – Demand Response Provider or Scheduling Coordinator – is responsible for providing the CAISO with settlement quality meter data rather than leaving the responsibility vague.	10.3	12/1/09	<p>The DRP's SC must provide SQMD to the Demand Response System for settlement of PDR's. If there is no SQMD meter data submitted into the DRS by the T+5B meter data submittal deadline, the CAISO will not estimate meter data for the underlying load of the PDR nor will it calculate a PDR generation measurement for the PDR without available SC submitted SQMD. Lack of settlement of PDR performance will be the only consequence of non-submittal of SQMD by T+5B.</p> <p>The requirements set forth in Section 10.3 apply only to Scheduling Coordinators representing Scheduling Coordinator Metered Entities and therefore clearly defines this as a responsibility of the SC for the DRP.</p>

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PGE	The settlement consequences on not providing SQMD for PDRs is not included or explicitly stated	10.3.6.1	12/1/09	<p>If there is no SQMD meter data submitted into the DRS for the T+5B meter data submittal deadline, the CAISO will be unable to create a baseline or calculate the PDR generation measurement for the PDR even if it was an event day for that PDR. Additionally, if there is no SQMD for a day that would otherwise qualify it to be in the selection of baseline days for the 10 in 10 non event day selection method, then the CAISO will be unable to create a baseline or calculate the PDR generation measurement for the PDR for other event days for that PDR. Accordingly the Demand Response System will provide Settlements with a "0" generation measurement value</p> <p>This detailed information will be in the Metering BPM where more detailed information will be available for Baseline Calculation and PDR generation measurement calculations.</p> <p>Therefore, the settlement consequence for this scenario would be that the PDR would not be paid for any event they may have performed to on the initial settlement statement T+7B, If SQMD is submitted subsequent to that and prior to the T+43C meter data submittal deadline, then the PDR would be paid for any applicable PDR generation measurement calculated with the submittal of SQMD by that deadline for the Recalculation Settlement Statement T+38B.</p> <p>Per section 10.3.6.2, when Actual Settlement</p>

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				Quality Meter Data is not received by the CAISO for a Scheduling Coordinator Metered Entity by forty-three (43) calendar days after the Trading Day (T+43C), the Scheduling Coordinator has failed to submit complete and accurate meter data as required by Section 37.5.2.1 and will be subject to monetary penalty pursuant to Section 37.5.2.2.
AReM	This section prohibits the submission of <i>estimated</i> settlement quality meter data (SQMD) for the initial settlements, which are based on T+5 meter data. This raises questions about how the initial settlements will be calculated for the load-serving entities (LSEs) associated with the PDR. If the CAISO plans to do no PDR related calculation until both the LSE and the PDR submit real SQMD, then the CAISO should say so. Further, the CAISO should explain how the initial settlement would work for the LSE associated with the PDR and how it would be trued-up later.	10.3.6.1	12/1/09	See comments above and the following: Additionally, as indicated in above settlement consequence discussion for a PDR, if a DRP's SC fails to submit SQMD for a PDR then the CAISO will be unable to create a baseline or calculate the PDR generation measurement for the PDR even if it was an event day for that PDR. Therefore there would be no default load adjustment associated with the PDR and therefore there will be no adjustment made to the Meter Data of that PDR's LSE's SC Default Lap resource ID for that particular PDR which would have an impact to the UIE settlement of the LSE in which the PDR resided.
SDG&E	SDG&E seeks a clarification on what action, if any, the CAISO will take to modify estimated SQMD for load associated with a Proxy Demand Resource if the LSE's submits estimated metered load at the CLAP that may be in conflict with final SQMD submitted at T+38C. SDG&E believes that CAISO should be indifferent whether meter data submitted at T+2 is estimated or actual, and would true-up calculations for the	11.1.5	12/1/09	See comments above and the following: The CAISO is indifferent to the treatment of Estimated Settlement Quality Meter Data and Actual Settlement Quality Meter Data submitted by the LSE's SC for the DLAP resource ID in which a PDR may be associated. The CAISO will create a DLA and apply it to both ESQMD and ASQMD submitted. The

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	<p>first re-calc statement issued at T+ 40 based on any meter data change that came in at T+38C. If SQMD is submitted for the Custom Load Aggregation Point (CLAP) associated with a Proxy Demand Resource within the timeline required for Initial Settlement at T+ 7B whether it includes estimated values or not, will the CAISO calculate Energy delivered on the PDR and add that amount to the LSE Load Resource ID as stated in Section 11.5.2.4 and include that on the Initial Statement at T + 7B without any action required by the PDR SC if it is different than the LSE SC? In particular, SDG&E seeks to ensure that 1) any inaction by the DRP (if different than the LSE) will not prevent the meter adjustment from being applied on the LSE's Preliminary Statement, and 2) that the PDR energy settlement would be completed in time for the initial statement if the LSE submits the meter data in time.</p>			<p>DLA will also be applied to CAISO Estimated Settlement Quality Meter Data if applicable, in the event that no meter data is submitted by the LSE's SC for the DLAP resource ID by T+5B. (see section 10.3.6.1)</p>
PGE	<p>11.5.2 Uninstructed Imbalance Energy</p> <p>...The Tier 2 UIE Settlement Amount for non-Participating Load and MSS Demand under gross Settlement is settled as described in Section 11.5.2.2 and 11.5.2.4. For MSS Operators that have elected net Settlement, the Tier 2 UIE Settlement Amount for Demand of a net MSS Demand is calculated for the Trading Hour as the sum of the product of the</p>	11.5.2	1/26/10	

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	hourly Tier 2 UIE quantity and the Real-Time Settlement Interval MSS Price.			
PGE	Adjustments to LSEs metered load are unduly limited to ‘solely for the purpose of setting Uninstructed Imbalance Energy’. A preferable approach would be that all Demand based charges should reflect PDR corrections as well (GMC, UFE, other uplifts).	11.5.2.4	12/1/09	This has already been set in policy.
AReM	As AReM understands it, the CAISO calculates the PDR performance (the metered load drop adjusted through the baseline formula) and then adds this quantity to the associated LSE’s meter data for purposes of determining UIE. The tariff describes this process as adding the “Energy delivered by a Proxy Demand Resource” to the LSE’s meter data. This description is confusing and AReM recommends revising it. For example, the use of the defined term “Energy” does not describe what is delivered by the PDR, nor does it describe the process that must precede the LSE adjustment. In particular, the tariff makes no reference to the fact that the meter data from the PDR is adjusted by the baseline formula before being added to the LSE meter data.	11.5.2.4	12/1/09	This is being clarified in the section with the introduction of the defined term PDR Energy Measurement. Additional detail on baseline and PDR performance calculation will be include in the Metering BPM.
EnergyConnect, Inc.	The language in 11.6 is not clear. The CAISO should be settling for each Proxy Demand Resource based on a comparison of metered Load and the Customer Baseline. We suggest this	11.6	12/1/09	This is being clarified in the section with the introduction of the defined term PDR Energy Measurement. Additional detail on baseline and PDR performance calculation will be include in the Metering BPM

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	paragraph be changed to read, "Settlements for Energy provided from Proxy Demand Resources will be determined by comparing each Proxy Demand Resource's metered Load with its Customer Baseline as established in accordance with the CAISO's applicable Business Practice Manuals."			
PGE	PG&E desires that the CAISO include language that acknowledges the different settlement and performance metrics that are used with PDR in Ancillary Services. The method agreed to in the Draft Final Proposal from September, 2009 is a "meter before / meter after" measurement	11.6.2	1/26/10	The meter before meter after concept has been explained in section 11.10.9.3
PGE	Line 10 of this states "All Bid Costs shall be based on mitigated Bids as specified in Section 39.7". Since PDR are excluded from the MPM-RRD process per Section 31.2 and 33.4, section 11.8 (line 10) will need to be modified.	11.8	1/26/10	<p>11.8, Line10 does state that "All Bids Cost shall be based on Mitigated Bids referenced in section 39.7"</p> <p>Section 39.7 (in the last line) refers to Section 31 and 33 for DAM and RTM respectively. ["The determination whether a unit is being dispatched to relieve a congestion on a competitive or non-competitive transmission constraint is based on two preliminary market runs that are performed prior to the actual pricing run of the market and are described in Sections 31 and 33 for the DAM and RTM, respectively"]</p> <p>Section 31.2 and 33.4 state that - Proxy Demand Resources are excluded from the MPM – RRD process.</p>

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				So the cross references establish that PDR is excluded as Section 11.8 is currently written.
EnergyConnect, Inc.	In Section 16.5.1 (pages 37 and 38), Demand Response Providers should be changed to Proxy Demand Resources if it is the resource that's required to comply rather than the entity. Some clarity on this point would be helpful.	16.5.1	12/1/09	Demand Response Provider has been chosen because of concerns raised by stakeholders that the ISO not be communicating directly with the retail customer.
PGE	<p>30.5.2.6.3 Non-Spinning Reserve Capacity</p> <p>.... In the case of Non-Spinning Reserve Capacity from Participating Load within the CAISO Balancing Authority Area, the Ancillary Service Bid must also contain: (a) a Load identification name and Location Code, (b) Demand reduction available within ten (10) minutes, (c) time to interruption following notification (minutes), and (d) maximum allowable curtailment duration (hour). In the case of Non-Spinning Reserve Capacity from Proxy Demand Resource within the CAISO Balancing Authority Area, the Ancillary Service Bid must also contain: (a) Location Code, (b) Demand reduction available within ten (10) minutes, (c) time to interruption following notification (minutes), and (d) maximum allowable curtailment duration (hour). In the case of Aggregated</p>	30.5.2.6.3	1/26/10	

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	Participating Load and Proxy Demand Resources , Scheduling Coordinators must submit Bids using a Generating Unit, or Physical Scheduling Plant Resource ID or Proxy Demand Resource ID for the Demand reduction capacity...			
EnergyConnect, Inc.	In Section 30.6 (page 40), the Day-Ahead Energy Market and the Real-time 5-minute markets are not the same. We recommend the language here be clarified.	30.6	12/1/09	The language has been changed in order to clarify: "PDR may submit bids in the Day-Ahead Market for Energy, including RUC, <i>in</i> the five (5) minute Real Time Market for Energy..."
PGE	PDR exclusion from bidding/scheduling and settlement on the InterTies and Hour Ahead Scheduling Process is missing.	30.6	12/1/09	The listing is inclusive, not exclusive. PDR can only submit bids for the items listed.
PGE	<p><i>30.6.3 Rescission of Payment and Suspension of Market Participation by a Proxy Demand Resource</i></p> <p>The CAISO will monitor Proxy Demand Resources using metrics to determine if a Bid from a Proxy Demand Resource represents a deliberate adjustment of Load taken in response to a Dispatch Instruction. Failure in one or more of these metrics could result in a market study to determine if the Bid from a Proxy Demand Resource represents a deliberate adjustment of Load taken in response to a Dispatch Instruction. These metrics will include those listed in the Business Practice Manuals. <i>In the event that the</i></p>	30.6.3	1/26/10	

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	<p><i>CAISO determines that a Bid for Energy from a Proxy Demand Resource (i) does not represent a deliberate adjustment of Load taken in response to a Dispatch Instruction and (ii) has resulted or will result in a payment for Demand Response Services not actually provided by the Proxy Demand Resource, the CAISO may rescind such payment and may immediately suspend the ability of the Proxy Demand Resource to provide Demand Response Services by sending written notification of the suspension to the Scheduling Coordinator for the Demand Response Provider representing the Proxy Demand Resource...</i></p>			
PGE	<p>It might not make sense for a PDR to have only a single Start Up and Shut-Down time. Aggregations of DR are not necessarily the same as individual PL customers. Different PDR customers can have different start up and shut down times.</p>	30.7.8	1/26/10	
PGE	<p>It might not make sense for a PDR to have only a single Start Up and Shut-Down cost. Aggregations of DR are not necessarily the same as individual PL customers. Different PDR customers can have different start up and shut down costs.</p>	30.7.9	1/26/10	
PGE	<p>The telemetry requirement for PDR that wishes to participate in the RUC market has to have telemetry? This requirement should not necessarily apply to a PDR;</p>	31.5.7.1	1/26/10	

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	other references to a telemetry requirement include Section 4.9.12.2.2 . PG&E requests that the CAISO explain for what specific purposes telemetered data is required.			
PGE	<p>34.8 Dispatch of Energy from Ancillary Services</p> <p>The CAISO may issue Dispatch Instructions to Participating Generators, Participating Loads, Proxy Demand Resources, (via communication with the Scheduling Coordinators of Demand Response Providers), System Units and System...</p>	34.8	1/26/10	
PGE	PG&E believes the CAISO has exceeded the requirements/capabilities of (some) PDR. Section 34.9.1 indicates that Exceptional Dispatch (ED) can be issued to PDR. This ability is coupled with the CAISO tariff 4.2.1 that requires market participants to comply with dispatch orders. However some DR programs to be included as PDR have 'optional' contractual compliance, as such, requiring CAISO ED for PDR may be inappropriate.	34.9.1	12/1/09	PDR is being treated comparably to other resources, which are not excluded from ED because of a contractual conflict; there must be a physical inability to comply with the dispatch instruction.
PGE	PG&E believes the CAISO has exceeded the requirements/capabilities of some PDR. Section 34.9.1 indicates that Exceptional Dispatch (ED) can be issued to PDR. However, some DR programs that will participate in PDR will not have the necessary communication systems, and requiring ED for PDR may	34.9.1	1/26/10	

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	be inappropriate.			
SDG&E	It is not clear what is meant by the term “managed” as it applies to a PDR (and subsequently Participating Load) that is part of a Resource Adequacy Plan when the SC is different than the LSE. SDG&E suggests this modification to the section “...Load Serving Entity, will be administered by the CAISO in accordance with the terms and conditions...”	40.6.12	12/1/09	We have modified Section 40.6.12 as suggested by SDG&E.
Appendix A - Definitions				
EnergyConnect, Inc.	The definition of Customer Baseline should be changed to note that it is an estimate of a PDR’s Load assuming it is not dispatched.	Defined Term: Customer Baseline	12/1/09	This is being clarified in the Tariff with the introduction of the defined term PDR generation measurement. Additional detail on baseline and PDR performance calculation will be include in the Metering BPM
EnergyConnect, Inc.	The defined term Demand Response Application refers to a software system that is apparently designed to capture information about each demand resource. We recommend this term be changed to “Demand Response Registration System” or some similar term that cannot easily be confused with a document the CAISO might require at some point from aspiring Demand Response Providers.	Defined Term: Demand Response Application (now Demand Response System)	12/1/09	We have changed the defined term “Demand Response Application” to “Demand Response System” and have made conforming changes to the draft tariff provisions
EnerNOC	“Demand Response Application” sounds like an application a Demand Response Provider might complete, but the definition seems to refer to forms CAISO uses to report on DR data. This is fairly confusing and would benefit from a new label so as not to be confused with a	Defined Term: Demand Response Application (now Demand Response System)	12/1/09	We have changed the defined term “Demand Response Application” to “Demand Response System” and have made conforming changes to the draft tariff provisions

Company	Comments	Related Tariff Section	Date of Comments	CAISO Response to Comments
	Proxy Demand Resource Agreement.			
EnerNOC	“Demand Response Services” is used to describe the demand from the PDR that is bid into the Day-Ahead and Real-Time Markets. How does this differ from “Proxy Demand Resource”?	Defined Term: Demand Response Services	12/1/09	Demand response is the service that is provided by proxy demand resources
EnergyConnect, Inc.	The notion of a Demand Response Service appears to be in conflict with a Proxy Demand Resource. Moreover, Proxy Demand Resource appears to be a more appropriate term everywhere Demand Response Service appears. For example, in Section 7.1.3 (f), dispatch instructions typically apply to resources, not services. We recommend the definition of a Demand Response Service be eliminated and Proxy Demand Resource be used in its place everywhere the term Demand Response Service appears.	Defined Term: Proxy Demand Resource Defined Term: Demand Response Service	12/1/09	The CAISO has used Demand Response Service in anticipation of services which are not just curtailment but which involve affirmative scheduling of load; The CAISO will revise section 7.1.3 (f) to state: “Dispatch Curtailable Demand and Demand Response Services which have been scheduled to provide Non-spinning reserve and Energy from Participating Loads and Proxy Demand Resources”
PGE	Demand reduction from a Proxy Demand Resource that can be bid into the Day-Ahead Market and Real-Time Market and dispatched at the direction of the CAISO.	Defined Term: Demand Response Services	1/26/10	
EnergyConnect, Inc.	The definition for Proxy Demand Resource Uninstructed Deviation Amount for Energy on page 62 refers to a section 11.6.1.1 that is not included in the markup.	Defined Term: Proxy Demand Resource Uninstructed Deviation Amount for Energy	12/1/09	This defined term appeared in the draft tariff language in error and has been deleted.
EnerNOC	“Proxy Demand Resource Uninstructed	Defined Term:	12/1/09	Uninstructed Deviation Penalties will not apply

Company	Comments	Related Tariff Section	Date of Comments	CAISO Response to Comments
	Deviation Amount for Energy” refers to Section 11.6.1.1, which is not included in this document. The section that appears to reference this topic is Section 11.23, which states that FERC has not approved CAISO’s request to charge Uninstructed Deviation Penalties for Imbalance Energy, so perhaps the definition is premature.	Proxy Demand Resource Uninstructed Deviation Amount for Energy		to loads or PDR.
PGE	The Resource ID for a Generating Unit, Participating Load, Proxy Demand Resource , or System Resource.	Defined Term: Resource Location	1/26/10	
Appendix B.14 – PDR Pro Forma				
EnergyConnect, Inc.	<p>In section 3.2.1 of the Pro Forma Proxy Demand Resource Agreement, it seems a little unusual to condition a party’s right to cure a default on whether it is “capable of being remedied”. We suggest removing this particular condition because it appears to provide the CAISO with a unilateral and commercially unreasonable right to determine whether an event of default can be remedied.</p> <p>In general, Section 3.2 of the Pro Forma Proxy Demand Resource Agreement implies that once it signs this agreement a Demand Response Provider assumes an indefinite, open-ended financial obligation. We recommend instead that the CAISO place a commercially reasonable, bilateral time limit on any new financial obligations of no more than two years from the date of termination.</p>	Appendix B.14 – PDR Pro Forma	12/1/09	<p>This language is taken from Section 3.2.1 of the existing Participating Load Agreement, which the agreement upon which the PDR Agreement was modeled. This is a common provision in default sections. Also, there an objective standard would apply to what is capable of being cured.</p> <p>Section 3.2 is also taken from the ISO Participating Load Agreement</p>

Company	Comments	Related Tariff Section	Date of Comments	CAISO Response to Comments
	<p>This means that a Demand Response Provider's obligation to assume new payment obligations would end two years after the termination date and its right to be paid as a result of new payment obligations imposed on others would also end two years after the termination date.</p> <p>In Section 4.1 of the Pro Forma Proxy Demand Resource Agreement, we recommend the first sentence be changed to read, "...the Demand Response Provider shall provide the CAISO with all <u>relevant</u> technical and operational information requires <u>by</u> the Demand Response Application for each Proxy Demand Resource that it owns, operates or to which it has a contractual entitlement." Moreover, stakeholders have agreed that UDCs and LSEs need to be able to verify certain information provided to the CAISO by Demand Response Providers, but UDCs and LSEs should not have the ability to approve or disapprove a customer's participation in the CAISO's markets as a Proxy Demand Resource (or as part of a Proxy Demand Resource). Accordingly to he last sentence of this section should be changed to read, "The CAISO will maintain the required technical and operational information, <u>which has been verified</u> by the appropriate Load Serving Entity and Utility Distribution Company..."</p>			<p>The ISO is concerned about potential dispute as to what is "relevant"</p> <p>The last sentence of Section 4.1 has been changed as requested.</p> <p>FERC Order 719 states that the Aggregator of Retail Customers should bear the burden of demonstrating that the local jurisdiction permits the participation—See Order 719 at Paragraph 49, footnote 78: "The RTO or ISO may specify certain requirements, such as registration with the ROT or ISO, creditworthiness requirements, and certification that participation is not precluded by the relevant electric retail regulatory authority. The RTO or ISO should not be put in the position of interpreting the laws or</p>

Company	Comments	Related Tariff Section	Date of Comments	CAISO Response to Comments
	<p>Section 4.3 of the Pro Forma Proxy Demand Resource Agreement appears to shift the burden of proof in FERC’s directive regarding the role of local regulatory authorities. We would like the CAISO to explain its rationale for requiring Demand Resource Providers to certify that they have obtained the approval of local regulatory authorities. We would also like the CAISO to explain how this apparent representation and warranty differs from the provisions of Section 8.</p>			<p>regulations of a relevant electric retail regulatory authority,”</p>
PGE	<p>4.3 Demand Response Provider Requirements.</p> <p><i>The Demand Response Provider must register with the CAISO through the Demand Response Application and comply with all terms of the CAISO Tariff, satisfied all Proxy Demand Resource registration requirements, and certify to the CAISO that its participation is authorized by the Local Regulatory Authority applicable to Demand Response Providers and Load Serving Entities and that it has satisfied all applicable rules and regulations of the Local Regulatory Authority. The Proxy Demand Resource Registration process and certification will ensure that a registered Proxy Demand Resource has the approval of the load serving entity whose load may be part of an aggregate Proxy Demand</i></p>	<p>Appendix B.14 – PDR Pro Forma</p>	<p>12/1/09</p>	<p>The protections that the suggested language seeks will be embedded in the registration process which the demand response provider must go through to register the resource.</p>

Company	Comments	Related Tariff Section	Date of Comments	CAISO Response to Comments
	<p>Resource prior to participating in the wholesale markets. Since the load is served by the LSE, and the LSE will pay for Day-Ahead power that is not consumed as a result of the dispatch of the proxy demand resource, the LSE has the ability to approve or reject a proxy demand resource registration.</p>			
EnerNOC	<p>We may have additional comments on this Pro Forma Agreement on the December 4 stakeholder call, but one section in particular is confusing. Section 4.3 states that the Demand Response Provider must “certify to the CAISO that its participation is authorized by the Local Regulatory Authority applicable to Demand Response Providers and that it has satisfied all applicable rules and regulations of the Local Regulatory Authority.” This seems to be a direct contradiction FERC Order 719, which places the responsibility on the Local Regulatory Authority to authorize direct participation of Demand Response Providers in CAISO wholesale markets. Please explain the rationale for this requirement.</p>	<p>Appendix B.14 – PDR Pro Forma</p>	<p>12/1/09</p>	<p>FERC Order 719 states that the Aggregator of Retail Customers should bear the burden of demonstrating that the local jurisdiction permits the participation—See Order 719 at Paragraph 49, footnote 78: “The RTO or ISO may specify certain requirements, such as registration with the ROT or ISO, creditworthiness requirements, and certification that participation is not precluded by the relevant electric retail regulatory authority. The RTO or ISO should not be put in the position of interpreting the laws or regulations of a relevant electric retail regulatory authority,”</p>
PGE	<p>PG&E recognizes that a standard bilateral contract might not be the chosen method for all LRAs to handle the overpayment of the LSE’s unused energy. We have proposed language that attempts to address this.</p>	<p>Appendix B.14 – PDR Pro Forma</p>	<p>1/26/10</p>	

Company	Comments	Related Tariff Section	Date of Comments	CAISO Response to Comments
	<p>4.3 Of Appendix B: Demand Response Provider Requirements</p> <p><i>The Demand Response Provider must register with the CAISO through the Demand Response System and comply with all terms of the CAISO Tariff and certify to the CAISO that its participation is authorized by the Local Regulatory Authority applicable to Demand Response Providers, and that it has satisfied all applicable rules and regulations of the Local Regulatory Authority. The Demand Response Provider must certify to the CAISO that the bilateral agreements or other relevant agreements between the Demand Response Provider and the Load Servicing Entities are fully executed, as applicable subject to the requirements of the applicable Local Regulatory Authority.</i></p> <p>C 2.1</p> <p><i>The operator must be able to completely disconnect the required Load or provide the demand reduction requested by the CAISO through the Proxy Demand Resource pursuant to a Dispatch Instruction within ten minutes after issue of the instruction;</i></p> <p>C 3.1</p>			<p>The CAISO will consider including the proposed language in Section 4.3</p>

Company	Comments	Related Tariff Section	Date of Comments	CAISO Response to Comments
	<p><i>The operator of the Generating Unit, System Resource, the Curtailable Demand, or the Demand Response Services Proxy Demand Resource must have a means of receiving a Dispatch Instruction to initiate an increase in real power output or a reduction in Demand (MW) within one minute of the CAISO Control Center's determination that Non-Spinning Reserve capacity must be dispatched</i></p>			
General and Miscellaneous Comments				
AReM	<p>Requirement for Separate Submission of Meter Data -- PDR meter data will be submitted in a completely separate process from the way meter data are currently provided to the CAISO. AReM recommends including this requirement in the tariff language because it differs from the requirements for submitting non-PDR meter data.</p>		12/1/09	<p>This is being clarified in the Tariff with the introduction of the defined term Demand Response System (DRS). Additional detail on the use and functions of the DRS will be included in the Metering BPM</p>
EnerNOC	<p>Some of the terminology used throughout the tariff would benefit from additional clarification as it is being introduced for the first time. As noted above, some terms appear to be used interchangeable, such as "operator of PDR" and "DR Provider" and may require additional clarification. In addition, we have noted a few definitions here that seem confusing.</p>		12/1/09	<p>These changes have followed the convention of the existing section with regard to "owner or operator"</p>
CDWR SWP	<p>Open Ended Changes or Missing Changes</p>		12/1/09	<p>As explained in the December 4, 2009</p>

Company	Comments	Related Tariff Section	Date of Comments	CAISO Response to Comments
	<p>Many sections of the proposed Tariff changes contain a bracketed comment indicating “The CAISO may propose modifications to this Section in order to implement Proxy Demand Resource.” Will the CAISO allow Market Participants sufficient time for inspection and comment for any further changes that may be produced?</p> <p>In Appendix A, Resource Location appears unmodified yet is listed in the PDR Table of Changes as being modified.</p>			<p>conference call, the tariff revisions were issued in two iterations. The second iteration was posted on January 18 and will be the subject of the January 29 conference call.</p>
CDWR SWP	<p>Equal Treatment The additional Tariff language for Section 30.6 Bidding and Scheduling of Proxy Demand Resources, on Page 39, should be more generally defined to include Demand Response Services or products instead of only Proxy Demand Resources, especially when referring to treating Bids for Energy and Ancillary Services from such resources like Bids for Energy and Ancillary services from other types of generation resources.</p>		12/1/09	<p>The CAISO believes that it is premature to expand the concept beyond Proxy Demand Resources to Demand Response Services.</p>
CDWR SWP	<p>Cost Recovery The proposed Tariff changes are unclear as to how the CAISO will remain financially whole when paying a performing PDR at CLAP prices while only charging the underlying Demand for the PDR at DLAP prices, assuming a difference exists between these prices.</p>		12/1/09	<p>See Settlement examples in implementation plan and in Jan 5 implementation workshop presentation. This will also be included in the Settlement BPM.</p>
PG&E	<p>The ability and extent of participation by the three Investor Owned Utilities with PDR has yet to be defined or approved</p>		12/1/09	<p>Noted, however, the CAISO prefers not to build in the local regulatory authority requirements into the CAISO tariff.</p>

Company	Comments	Related Tariff Section	Date of Comments	CAISO Response to Comments
	by the California Public Utilities Commission (CPUC). PG&E believes that further revisions to the tariff may be required depending on the decisions of the CPUC.			
PG&E	There are a number of issues that are seemingly missing from either the PDR tariff or the Business Requirements Specifications (BRS). In responding to PG&E's 11/24/09 comments on the BRS, the CAISO indicated on areas of the Registration Process, Market Power Mitigation, A/S Procurement and PDR, and Telemetry Requirements that the details were still being worked out. PG&E believes these issues need to be resolved and incorporated into the tariff or BRS.		12/1/09	The ISO believes that there are not remaining technical issues such as A/S procurement, telemetry or other issues that still need to be resolved.
PGE	PG&E recommends the CAISO tariff should explicitly state that PDRs are not eligible Interim Capacity Procurement Method (ICPM) designations (at least until Resource Adequacy (RA) rules for PDR have been developed), or for use as Congestion Revenue Rights (CRR) sources within the CRR allocation process.		12/1/09	<p>The CAISO will not include PDR as a resource eligible for ICPM designation</p> <p>The CAISO will consider making an addition to Section 30.8.4 [Eligible Sources for CRR Allocation] so that the first line reads "In the CRR Allocation processes for Seasonal CRRs, Monthly CRRs, and Long Term CRRs, nominated CRR Sources can be either PNodes (including Scheduling Points) or Trading Hubs, <i>except that a Proxy Demand Resource cannot be a nominated CRR Source in a CRR Allocation process.</i>"</p>
PGE	Gaming – The Draft Tariff does not include language that addresses the gaming concerns discussed in Section 4		12/1/09	The ISO has included language in Sections 30.6.2 and 30.6.3. The CAISO is considering modifying the language further as follows:

Company	Comments	Related Tariff Section	Date of Comments	CAISO Response to Comments
	<p>of the CAISO's Draft Final Proposal. In this section, the CAISO commits to creating metrics that will assist in identifying gaming behavior. PG&E recommends the CAISO include the following tariff language that reflects the design elements in Section 6.1 of the Draft Final Proposal:</p> <p><i>The CAISO will monitor certain metrics in order to identify potential gaming behavior. Should a PDR resource repeatedly fall outside of identified ranges, or fail multiple metrics, a market monitoring study would be performed to determine if there is a likelihood that the Proxy Demand Resource has been compensated for demand response that was not really provided to the market. The CAISO may ask the DRP to provide data to support proof of performance. If the CAISO concludes that the Proxy Demand Resource has been unduly compensated, the PDR resource will be removed from further participation in the CAISO markets.</i></p>			<p>30.6.2 Bidding Requirements</p> <p>“All Bids for Energy from Proxy Demand Resources are required to represent deliberate adjustments of Load taken in response to a Dispatch Instruction. <i>If requested by the CAISO, the Demand Response Provider shall provide to the CAISO data to support proof of performance of the Proxy Demand Resource.</i>”</p> <p>30.6.3 Rescission of Payment and Suspension of Market Participation by a Proxy Demand Resource</p> <p><i>In the event that the CAISO determines through evaluation of the proof of performance described in 30.6.2 or its own quantitative analysis that a Bid for Energy from a Proxy Demand Resource (i) does not represent a deliberate adjustment of Load taken in response to a Dispatch Instruction and (ii) has resulted or will result in a payment for Demand Response Services not actually provided by the Proxy Demand Resource, the CAISO may rescind such payment and may immediately suspend the ability of the Proxy Demand Resource to provide Demand Response Services by sending written notification of the suspension to the Scheduling Coordinator for the Demand Response Provider representing the Proxy</i></p>

Company	Comments	Related Tariff Section	Date of Comments	CAISO Response to Comments
				<p>Demand Resource. Within two Business Days of the notice of suspension, the CAISO will provide the Scheduling Coordinator and the affected Convergence Bidding Entity with the information justifying the decision to suspend. The CAISO and the affected Scheduling Coordinator and Convergence Bidding Entity will confer and exchange information in an effort to resolve any dispute as to whether suspension is warranted. The CAISO will submit supporting documentation, including any information provide to the Scheduling Coordinator and the affected Demand Response Provider with FERC within ten (10) Business Days after any suspension unless the CAISO concludes that suspension is not warranted. The CAISO will provide the Scheduling Coordinator and the affected Demand Response Provider with a copy of any documentation submitted to FERC. The suspension will remain in effect for ninety (90) days after the CAISO submits its initial filing of supporting documentation to FERC, unless FERC directs otherwise or the CAISO determines that the suspension should continue for fewer than ninety (90) days. After the ninety (90) day period expires, the suspension will remain in effect only if FERC requires it to remain in effect</p>
PGE	<p>Incorporation of Non-Generator Participation In Ancillary Services Markets Proposal - PG&E does not believe that Appendix K incorporates the proposed changes outlined in the both the CAISO's Draft Final Proposals for Non-Generator Participation in Ancillary</p>		12/1/09	<p>These points are part of another ISO initiative on Non-Generation Resources which is in progress. The ISO believes that it is premature to place those anticipated changes into the PDR initiative at this time. The Non-Generation Resources proposal and design must receive approval before detail can be</p>

Company	Comments	Related Tariff Section	Date of Comments	CAISO Response to Comments
	<p>Services Markets and Proxy Demand Resource. Specifically, Appendix K states:</p> <p>C 1.1. <i>The rated capacity of the Generating Unit or System Resource must be 1 MW or greater unless the Generating Unit is participating in an aggregation arrangement approved by the CAISO.</i></p> <p>However, in the Draft Final Proposal for Non-Generator Participation, the CAISO proposes that the minimum rated capacity requirement should be reduced to 500kW from the existing 1MW requirement; and in the Draft Final Proposal for PDR states the minimum rated capacity requirement is 10kW. PG&E suggests that C1.1 be changed to:</p> <p><i>The rated capacity of a Generating Unit of System Resource must be 10kW or greater unless the Generating Unit is participating in an aggregation arrangement approved by the CAISO. The Generating Unit must be able to increase output as soon as possible to the value indicated in a Dispatch Instruction, reaching the indicated value within ten minutes after issue of the instruction and be capable of maintaining output for 2 hours.</i></p> <p>However, in the Draft Final Proposal for</p>			<p>placed in the tariff.</p>

Company	Comments	Related Tariff Section	Date of Comments	CAISO Response to Comments
	<p>Non-Generator Participation, the CAISO proposes that the continuous energy requirement for spinning and non-spinning reserves should be reduced to 30 minutes from the existing 2 hour requirement. PG&E suggests that C1.2 be changed to:</p> <p>The Generating Unit must be able to increase output as soon as possible to the value indicated in a Dispatch Instruction, reaching the indicated value within ten minutes after issue of the instruction and be capable of maintaining output for 30 minutes.</p> <p>These changes are designed to synchronize the differences between these two separate initiatives.</p>			
PGE	<p>Section 3.3 – This section of the Draft Final Proposal states:</p> <p><i>The CLAP is a set of one or more load nodes, which is used for scheduling, pricing, and settlement with Loads. In the case of PDR resources, since the demand response is bid separately from the underlying Load and is represented by proxy generators, technically the mechanism for submitting bids uses Generation Distribution Factors (GDFs) rather than Load Distribution Factors (LDFs).(Page 9)</i></p> <p>PG&E proposes the following language to recognize the importance of utilizing</p>		12/1/09	The first sentence will be incorporated. The second sentence is more suitable for the Business Practices Manual

Company	Comments	Related Tariff Section	Date of Comments	CAISO Response to Comments
	<p>GDFs versus LDFs:</p> <p>For PDR, Demand Response will be bid separately from the underlying load. The PDR will use Generation Distribution Factors for submitting bids instead of Load Distribution Factors.</p>			
PGE	<p>The tariff language inter-mixes the use of 'Participating Load' and 'Load' (e.g. Sections 6.3.1, 8.4.5, 8.9, 8.9.7.1, 8.9.11, 8.10.6, 11.23c, and 31.3.1.4); the uses should be clarified to be consistent and to explicitly address 'participating load', and 'non-participating load' rather than 'load'.</p>		12/1/09	<p>The comments go to potential language clarifications for Participating Load, which are beyond the scope of this tariff revision effort. The ISO intends to address such language issues in a future tariff effort, most likely the effort pertaining to Participating Load enhancements.</p>