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To: CAISO Tariff <MRTUtariff@caiso.com>
Subject: Comments on RSI-2 Tariff Language

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Page	Section	Language
20	40.3.2	In added language: In no instance, however, are Load Serving Entity's Entities...
27	40.9.3.4 (d)	The language in this subsection indicates that the RAIM availability calculation excludes capacity on a Forced Outage in a nature of work category related to, <i>inter alia</i> , “ a cause outside of the control of the resource owner ”. But BPM for Reliability Requirements Section 9.6.5 requires that substitution be provided in the case of “Ambient Due to Fuel Insufficiency”. Where fuel insufficiency is the result of things like wellhead freeze-off, any fuel insufficiency is clearly beyond the control of the resource owner. But, per BPM for Reliability Requirements Section 9.6.5, such outage would not be excused under 40.9.3.4 (d), introducing a conflict between the tariff language and the BPM. The CAISO holds that where the Tariff and a BPM conflict, the Tariff would control – would this mean that any outage due to fuel insufficiency beyond the control of the resource owner (like wellhead freeze-off) be excluded from the RAIM availability calculation without the need to procure substitute capacity?
29	40.9.3.6	The tariff language uses the defined term “RA Reliability Margin”, which is defined as “The CAISO system forecast monthly peak Demand, plus a reserve margin of 15 percent of the forecast monthly peak Demand, based on the forecast prepared by the California Energy Commission.” Does that mean that any assessment conducted by the CAISO in relation to “RA Reliability Margin” will look only to see if the CAISO has adequate RA capacity on a system basis, and will not evaluate local reliability need? If the CAISO intends to look at local reliability issues, then the definition of RA Reliability Margin should be revised.



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