

May 9, 2017

**COMMENTS ON BEHALF OF THE CITIES OF ANAHEIM, AZUSA, BANNING,
COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA
ON THE DRAFT TARIFF LANGUAGE IN THE BLACK START AND SYSTEM
RESTORATION PHASE 2 INITIATIVE**

In response to the ISO's request, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the "Six Cities") submit the following comments on the proposed tariff language posted on May 1, 2017 in the Black Start and System Restoration Phase 2 stakeholder initiative:

General Comments - -

(a) The draft tariff language does not include any description of the procedure for Black Start procurement. The Six Cities believe that the tariff should include a description of the Black Start procurement procedure, which could be based on the description in the April 24, 2017 memorandum to the ISO Board at page 3.

(b) In general, it is difficult to follow the logic of proposed changes to Section 8. The draft tariff language does not propose to modify existing Section 8.2.3.4, but many or most other references to Black Start service in earlier sub-sections of Section 8 are being deleted or moved to Section 8.8 or Appendix D. The Six Cities request that the ISO provide an explanation for the guiding objectives or approach underlying the proposed deletions and/or relocations of existing tariff language in Section 8.

Section 4.9.4.5 - - The Six Cities request an explanation for the deletion of the current language in this section.

Section 8.1 - - The Six Cities request an explanation for deletion of "(iv) Voltage Support" from the third line from the top of page 2 and note that Section 8.3.5 continues to address Voltage Support.

Section 8.3.1 - - With respect to the proposed deletion of the next to last sentence in the section (appearing on page 5 of the draft), the Six Cities recommend leaving the language in place or, alternatively, including the language in Section 8.8.1.

Section 8.9.13 - - The Six Cities request an explanation for the proposed deletion of this section, as performance audits for Black Start services do not appear to be addressed elsewhere in the draft tariff language.

Definition of "Interim Black Start Agreement" - - In light of the proposed revisions to the text of the definition, delete "Interim" from the title of the definition.

Definition of “Reliability Services Costs” - - Change the last sentence of the definition to read, “Reliability Services Costs include costs charged by the CAISO to a Participating TO associated with service provided under a Reliability Must-Run Contract, or a Black Start Agreement, as well as”

Submitted by,

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