

August 10, 2017

**COMMENTS OF THE CITIES OF ANAHEIM, AZUSA, BANNING, COLTON,
PASADENA, AND RIVERSIDE, CALIFORNIA ON COMMITMENT COST
ENHANCEMENTS PHASE 3 DRAFT TARIFF LANGUAGE
POSTED ON JULY 31, 2017**

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 draft tariff language for the Commitment Cost Enhancements Phase 3 tariff modifications posted on July 31, 2017:

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| Section 4.6.4(1) | In the second line, insert “, environmental operating constraints,” after the word “capabilities”. |
| Section 30.4.1.1.6.1.1 | <p>The Six Cities request that CAISO provide an explanation of the meaning of and the basis for the requirement in sub-part (3).</p> <p>In the text that follows sub-part (3), in the thirteenth line, change “CPUC” to “appropriate Local Regulatory Authority”.</p> <p>In the same text in the fourteenth line, change “CPUC” to “such Local Regulatory Authority”.</p> |
| Section 30.4.1.1.6.2.1 | In the seventh line of the section, strike “will” after “adder”. |
| Section 30.4.1.1.6.2.2 | Re the second sentence of the section, the Six Cities request that CAISO explain why the ten (10) percent reserve margin will apply only to “the limitation of the Use-Limited Resource that is most likely to be reached” rather than to each limitation for which Opportunity Cost is being calculated. The Six Cities understood that Opportunity Costs for each limitation are calculated independently and are additive. If that is the case, it would seem that the reserve margin should apply for each calculation. |
| Section 30.4.1.1.6.3 | In the second paragraph of the section, first line, change “for” to “will be”. |

Section 40.6.8(d)

Re the reference to Section 30, Section 30 consists of 55 pages and many sub-sections. The reference should be more specific.

Submitted by,

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