

December 14, 2018

**COMMENTS OF THE CITIES OF ANAHEIM, AZUSA, BANNING, COLTON,
PASADENA, AND RIVERSIDE, CALIFORNIA ON ADDITIONAL DRAFT TARIFF
LANGUAGE AND DRAFT BPM PROVISIONS FOR COMMITMENT COST
ENHANCEMENTS PHASE 3**

In response to the ISO's request, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the "Six Cities") provide their comments on the additional draft tariff language and draft Business Practice Manual provisions posted on December 7, 2018 for the Commitment Cost Enhancements Phase 3 ("CCE3") initiative:

Draft Tariff Language:

Section 40.6.1.1(b)(1)(B) - - In the second line, change "physically capable of operating" to "not on Outage" for consistency with other revisions.

Section 40.6.2(f) - - Why are the proposed revisions to this sub-section different from the proposed revisions to Section 40.6.1.1(a)? Specifically, why is the phrase "that are not Use-Limited Resources" retained in this sub-section but deleted from Section 40.6.1.1(a)?

Section 40.6.2(g) - - Why are the proposed revisions to this sub-section different from the proposed revisions to Section 40.6.1.1(b)? Specifically, why is the phrase "and are not Use-Limited Resources" retained in this sub-section but deleted from Section 40.6.1.1(b)(1)?

Section 40.6.4.1 - - The two paragraphs added at the end of the section (bottom of page 8 of the draft tariff language) are not clear.

With respect to the first paragraph, what are the "inherent properties" of a source as distinguished from the capabilities of an individual Generating Unit? Does a solar or wind unit paired with storage capability have multiple sources of energy?

With respect to the second paragraph, the purpose and intent of the language is unclear. Is it the intent of this language to negate a RAAIM exemption provided for in Section 40.9.2? If that is the case, then Section 40.9.2 should be revised for clarity.

Section 40.6.5.1 - - Should this section also refer to Medium Start Unit for consistency with previous revisions?

Section 40.8.1.6 - - What constitute backup sources of generation? Is storage capability a backup source of generation? Recognizing that this is existing tariff language, clarification is important for implementation of the CCE3 initiative.

Section 40.9.3.4(d) - - In the third line, delete “Forced” for consistency with the revision to the caption of the subsection.

Section 40.9.3.4(e) - - It is not clear why the provisions of this subsection should apply only in the event of a Forced Outage. The Six Cities request explanation and/or clarification.

Appendix A, Definition of Conditionally-Available Resource - - The proposed definition for this term seems unduly vague and open-ended. For example, it would appear that most resources classified as Use-Limited Resources also would satisfy the proposed definition of Conditionally-Available Resource. The Six Cities recommend that the ISO attempt to specify what types of limitations will support classification as a Conditionally-Available Resource and how such limitations must be documented.

Draft Revisions to the BPM for Reliability Requirements:

Section 7.1.2 (4) - - In the second line, add “for” after “DAM.”

Section 7.1.3 - - In the last paragraph, second line, add “for” after “RTM.”

Section 7.1.3.1 - - In the fourth line, change “SLIC” to “OMS”.

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