

Response to Stakeholder Comments on Summary of Issues and Draft Tariff Language

Tariff Clarifications

Topic	Stakeholder	Comment	Response
Business Day	Six Cities	Revised language for Sections 11.29.7, 11.29.10, and 11.29.24 should reference the specific BPM, not a general reference to “the Business Practice Manual.”	Since the inception of the development of Business Practice Manuals and the first references to them in the CAISO Tariff, the CAISO has simply referred to them generically in the tariff. This decision was made after considerable debate. The reason that won the day is the flexibility to rename BPMs, move material between BPMs without needing to make a corresponding tariff change.
Business Day	Six Cities	Add to Appendix A -- “The undefined term ‘business day’ as used in some sections of the tariff means all days on which the CAISO is open for business, including several holidays which are federally recognized but remain regular operation days for the CAISO. Please see the Business Practice Manual for [Title of the relevant BPM] for the most current list of affected holidays.”	[See Proposed Additional Clarifications document]
General	SCE	Opposes the short timeframe that doesn't permit sufficient stakeholder review.	These are straightforward clarifications that improve the accuracy of the tariff and align the tariff with policy. The ISO would be happy to work with individual stakeholders if there are any questions regarding any of the proposed changes.
IDS	SCE	Enhanced penalty to over-deliveries will negatively affect ETC/TOR holders who can increase schedules in Real-time (after HASP and after ADS hourly dispatch)	Section 11.31.1.3 already excludes from penalties "Energy that is either delivered or not delivered as part of a valid ETC Self-Schedule or TOR Self-Schedule."



California ISO

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IDS	Shell Energy	External transmission providers can impose reliability limits or derates. Compliance with those requirements lead to IDS penalties. ISO should have exemption when external transmission providers "updates path limits which results in reduced scheduling rights."	The IDS policy is to exempt from penalties deviations caused by reliability curtailments issued by the ISO or other balancing authorities/transmission service providers. The intent was not to exempt all deviations that may be outside the scheduling coordinator's control. Through the BPM or elsewhere, the ISO can consider further whether the scenario Shell describes meets the exemption in tariff section 11.31.1.3(a) for "Energy that is not delivered because a Balancing Authority or EIM Transmission Service Provider curtailed the delivery for reliability reasons."
Short Start/Long Start	SCE	Explicitly add that it is the "cold" start up time.	The start-up time uses the longest start up time in the Master File, which would align with the "cold" start up time. The ISO proposes to include these details in the BPM.
Short Start/Long Start	SCE	Provide clarity around which Start up time is used for MSG resources. Startup times are found in the "STARTUP" tab as well as in the "CONFIG_STRT" tab and they may not necessarily align.	For non-MSG resources, as noted above, the ISO uses the longest start time registered in the Master File. For MSG resources, the ISO uses the longest start time registered for the resources at the plant level as a resource is defined as either a long start or short start. The ISO will include these details in the BPM.
Short Start/Long Start	SCE	Address whether the startup time will come from the "CONFIG_STRT" tab, and whether CAISO will use the fastest startable config, the slowest startable config, or something else.	Start up time will come from the start up tab at the plant level and will be the longest start time registered.



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Short Start/Long Start	SRP	Clearly differentiate changes that apply to the Real Time and Day Ahead commitments versus EIM.	Currently no resource can be decommitted in real-time if they have a non-zero base schedule. However, short-start resources can be committed in real-time if they are defined as Short -Start.
Short Start/Long Start	SRP	Section 11.8.1.2 should clarify if the minimum up time (MUT) used for the cycle time is applied at the configuration level or at the plant level for multi-stage units.	For MSG resources, use the Minimum Up Tim registered for the plant (not the configuration level) in the MF.