

## Response to Stakeholder Comments on Draft Tariff Language Imbalance Conformance Enhancements

Tariff Section	Stakeholder Comment	ISO Response
27.12.1	<p>1. NRG comments that the generic verb “conform” does not meaningfully describe what the CAISO is actually doing, namely, manually adjusting an automated forecast of a variable (in this case, demand,) that is a key component of the CAISO’s markets. The CAISO should create a defined term “Conform” and include that defined term in Appendix A to the Tariff.</p> <p>2. NRG suggests the following edits:</p> <p>...reliability curtailment due to transmission equipment outages; weather changes; pumping resources schedule changes; input data...</p> <p>3. NRG further comments that if the “input data” referred to in this context could include things other than demand forecasts. NRG suggests making this language more generic; if the input data consists solely of demand data, then NRG suggests replacing “input data” with demand data.”</p> <p>4. NRG further comments that if the CAISO is going to define the verb “Conform,” then it should also describe the noun “Conformance.” Additionally, NRG recommends that the CAISO</p>	<p>1. The CAISO will add language within the text itself that explains that conform means an adjustment to the CAISO Forecast of CAISO Demand.</p> <p>2. Accept.</p> <p>3. Will change the sentence as follows: The CAISO or EIM Entity operators will consider factors such as: <del>inaccurate</del> load forecast <u>discrepancies</u>; Area Control Error adjustments; Variable Energy Resource deviations; resource outages not entered in the Outage Management System; generator testing; reliability curtailments due to transmission or equipment outages; weather changes; <u>and</u> pumping resources schedule changes; <del>input data based on averages that do not reflect dramatic load increase or decrease seen in the operational timeframe.</del> The CAISO and the EIM Entity will log Operator conformances.</p> <p>4. Changes in 1. Should capture these.</p>

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	create defined terms “Conformed” and “Conformance.”	
27.12.1	5. Idaho Power Company comments that in the sentence: “The CAISO and the EIM Entity will log Operator conformances,” that it is not clear on where or how conformances are to be logged. Idaho Power Company questions how the CAISO envisions this to occur and if the tool will require a comment to be entered or if there will another mechanism.	5. The tool has a comment section and EIM entities should enter the reasons for the load conformance in that section.
27.12.2	6. NRG suggests the following edits:  The limiter will: (1) be based on the conformance and ramping capability shortages or surplus changes between intervals;	6. Accept.
31.5.3.1.1	7. NRG proposes the following edits:  The CAISO Operator will consider factors such as: CAISO Forecast Of CAISO Demand error; <del>dramatic</del> weather pattern that is expected to continued or change with the next Trading Day; generator outage resulting in different Supply availability than was bid into the Day-Ahead Market; fire <del>danger</del> that threatens transmission lines and/or corridors; <u>and the</u> exception that <u>the amount of</u> Generation committed in the IFM will not <u>be sufficient to</u> meet the anticipated Demand and Reliability Coordinator next-day analysis or system conditions.	7. Accept.
31.5.3.1.1	8. The Six Cities proposes the following edits:	8. Accept



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	<p>The CAISO Operator may conform the CAISO Forecast Of CAISO Demand in the event the CAISO Operator has determined that additional capacity may <del>be</del> need to be procured in RUC to meet anticipated Real-Time system conditions. The CAISO Operator will consider factors such as: CAISO Forecast Of CAISO Demand error; dramatic weather pattern that is expected to continued or change with <u>in</u> the next Trading Day;</p>	