

Response to Stakeholder Comments on Draft Tariff Language 2018 Tariff Clarifications

Tariff Section	Stakeholder Comment	ISO Response
4.6.3.4	The Six Cities comments, even though this section is not included in the upcoming tariff clarifications filing, the ISO should take the opportunity to clarify the Tariff by eliminating Section 4.6.3.4, since all of the language in Section 4.6.3.4 also is included in Section 4.6.3.5.	The ISO will look into and address the issue of duplicative language in this or in a future tariff clarifications filing. This initiative is the first of at least two tariff clarifications filings.
4.13.4.2(a)	Sunrun comments that it agrees with the proposed redline change to zero out the Generator Output Baseline in the event the resource is unable to collect the minimum targeted number of baseline hours. Sunrun does request that the proposed changes enable retroactive baseline calculated to be made by the resources if desired for any period in 2018, subject to ISO Board and FERC approvals.	The ISO is not be able to accommodate a request for a retroactive effective date. The Federal Power Act requires 60 days' notice in advance of a proposed effective date. FERC can waive the prior notice requirement and the ISO will consider making that request in the upcoming tariff amendment filing.
8.4.1.2 (4 th paragraph)	The Six Cities comments that the revision in the draft tariff language is not consistent with the indicated in the Changes Matrix, and that the change in the Changes Matrix appears to be correct.	The ISO will align the draft tariff language to reflect the revisions in the Changes Matrix.
30.6.2.1.2.1	The Six Cities comments that the draft tariff language that the final digit in the Section reference is missing, as the numbering sequence is correct in the conformed Tariff as of February 15, 2018.	The ISO will correct the numbering sequence in the draft tariff language.

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39.10.1	The Six Cities recommends changing the word “Exception” to “Exceptional” in the second line of the section.	The ISO will make this change.
39.10.2	The Six Cities recommends adding the word “Energy” after the word “Dispatch” in the second line of the section.	The ISO will make this change.
Appendix A - RTD Instructed Imbalance Energy (RTD IIE)	<p>PacifiCorp raises the question if the definition of RTD Instructed Imbalance Energy (RTD IIE) should be modified to mirror FMM Instructed Imbalance Energy (FMM IIE) in that it should read as follows:</p> <p><i>The accounted for Eenergy resulting from the difference between Dispatch Instructions and the Day-Ahead Schedule Energy <u>or EIM Base Schedule Energy</u> that has not already been accounted for as FMM Instructed Imbalance Energy determined pursuant to Section 11.5.1.2.</i></p>	<p>The ISO modified the language as follows to mirror the definition of FMM Instructed Imbalance Energy (FMM IIE) as follows:</p> <p><i>The accounted for <u>e</u>energy resulting from the difference between Dispatch Instructions and the Day-Ahead Schedules <u>Energy and EIM Base Schedules Energy</u> that <u>have</u>s not already been accounted for as FMM Instructed Imbalance Energy determined pursuant to Section 11.5.1.2.</i></p>
Appendix M Section 1.5.4	The Six Cities comments that the ISO needs to add “and/or Regulation” after “Reserves” in the first line of the draft tariff language to be consistent with the Changes Matrix.	The ISO modified the draft tariff language to simply state “and Regulation,” and has incorporated the revisions in the Changes Matrix.