

**Comments Of EDF On Revised Draft Tariff Language
For the CAISO Dispatch Operating Target Tariff Clarification Initiative**

EDF-Renewables (EDF) appreciates this opportunity to offer comments on the revised draft tariff language posted in the CAISO's Dispatch Operating Target (DOT) Tariff Clarification Initiative.

EDF appreciates the CAISO's tariff revisions clarifying that failure to follow a smooth trajectory between DOTs in an Operating Instruction would not be a conduct-rule violation.

However, there is still an ambiguity about the CAISO's obligation to consider all effective economic bids before issuing Operating Instructions. In particular, the CAISO's response to stakeholder comments and questions on this point does not seem logically consistent.

- The CAISO correctly states that tariff Section 7.6 (referenced in the proposed tariff language) says it cannot assume "supervisory control" over other generating units "until it has used all bids effective in responding to the problem."
- The CAISO then contends that this tariff provision does not require it to "exhaust all effective economic bids" before issuing an Operating Instruction and that "in some cases the economic bids may not satisfy or resolve a local or system constraint." However, if an economic bid does not "respond to the problem" or "satisfy or resolve a local or system constraint," then it is not "effective" and would not need to be considered under this tariff provision. In other words, the CAISO's contention does not relieve it of the requirement to consider all effective economic bids before issuing Operating Instructions.

As noted in EDF's prior comments, a statement that all effective economic bids should at least be considered (not necessarily "exhausted") before Operating Instructions are issued is an important clarification that should be included in the new tariff language explicitly. The CAISO can still issue Operating Instructions if the economic bids are not "effective" (e.g., the units aren't fast enough or in the right place, or are otherwise ineffective) or there are not enough such bids in total to fix the problem; however, those bids should be incorporated into the CAISO's response to operating problems, and used if possible before Operating Instructions are issued.