



## Stakeholder Comments Template

### Commitment Cost Enhancements (CCE) Tariff Clarifications

This template has been created for submission of stakeholder comments on the Straw Proposal for the CCE Tariff Clarifications initiative. The paper, stakeholder meeting presentation, and all information related to this initiative is located on the [initiative webpage](#).

Upon completion of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com). Submissions are requested by close of business **January 6, 2019**.

Submitted by	Organization	Date Submitted

**Please provide your organization's general comments on the following issues and answers to specific requests.**

#### 1. Conditionally Available Resources

Please provide your organization's feedback on the Conditionally Available Resources (CAR) proposal. Please explain your rationale and include examples if applicable.

No comment at this time.

#### 2. Run-of-River Hydro

Please provide your organization's feedback on the Run-of-River Hydro proposal. Please explain your rationale and include examples if applicable.

No comment at this time.

#### 3. Hydro Resource Counting Rules

Please provide your organization's feedback on the Hydro Resource Counting Rules proposal. Please explain your rationale and include examples if applicable.

NCPA believes that the proposed one size fits all approach will not work with hydro resources since the operating characteristics of individual hydro resources, and associated watersheds, can differ due to a number of factors and therefore urges CAISO to grant flexibility to individual LRAs to determine the most appropriate counting methodology. Alternatively, as stated in NCPA's comments to the RA Enhancements Second Revised

Straw Proposal, NCPA could potentially support counting rules similar to PJM's where UCAP = ICAP. At a minimum, NCPA supports CAISO's proposal to allow LSEs to choose between new and traditional methodologies.

**4. Additional comments**

Please offer any other feedback your organization would like to provide from the straw proposal and topics discussed during the web meeting.