

Peak Reliability (Peak) appreciates the opportunity to comment and the work that CAISO has done to clarify the approaches to address pre- and post-contingency SOL/IROL exceedances. Peak supports the work done to use the market optimization to address these types of exceedances as alternatives to exceptional dispatch and minimum online commitment constraints. Peak offers the following clarifying comments for the next iteration of the proposal.

1. CAISO states that initiative is “focused on alternatives to exceptional dispatch and the MOC constraints in addressing the **post-contingency** 30 minute SOL/IROL requirements...” (Section 3, page 6) It would be helpful to include some discussion of how this relates to pre-contingency actions as well.
2. Section 4.1 provides substantial background on TOP-007 and TOP-007-WECC-1, however, citing Peak’s SOL Methodology and additional FAC standards would help to provide a more complete background on SOL/IROL requirements.
3. Section 4.1 generally focuses on the WECC Major Transfer Paths that CAISO is responsible for. However it is unclear if this process is meant to address other facilities as well, so this should be clarified. Also, the statement at the top of page 8 implies that Table 1 is *all* of the Major WECC Transfer Paths, rather than just the CAISO ones, so this should also be clarified.
4. Section 4.1, page 9 states that “the WECC standard does not contemplate [load shedding] as an option for a system operating limit” and references TPL-003. This does not give the full picture and we feel it may be helpful for the CAISO to provide further clarification in the next version of the proposal. We suggest the CAISO provide further clarification by stating that while it has the authority under TOP-001 to take whatever actions are needed to ensure the reliability of its area, the WECC standard doesn’t explicitly reference load shed as a normal pre-contingent operating plan if there are adequate resources available on the system. As stated at the end of the referenced paragraph, load shedding is always a viable last resort measure in the post-contingent state but clearly not a desirable option if there are adequate resources available on the system.