



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. Submissions are requested by close of business **January 6, 2019**.

Submitted by	Organization	Date Submitted
<i>Bonnie Blair 202-585-6905 bblair@thompsoncoburn.com</i>	<i>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, CA ("Six Cities")</i>	<i>January 6, 2020</i>

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.

Six Cities' Comments: The Six Cities do not agree with the ISO's proposal to apply Resource Adequacy Availability Incentive Mechanism ("RAAIM") penalties to Conditionally Available Resources ("CARs"). Like Variable Energy Resources or run-of-river hydro resources, which are exempt from RAAIM penalties, the availability of CARs is dictated by conditions or restrictions that are outside the control of the resource owner or operator. There is no logical reason to treat CARs differently, for purposes of RAAIM exemption, from other types of resources with similar uncontrollable limitations on availability.

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.

Six Cities' Comments: The Six Cities support the ISO's proposal to exempt Run-of-River hydro resources from application of RAAIM provisions. The Cities take no position at this time with respect to potential approaches for calculating RA capacity value for Run-of-River hydro.

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.

Six Cities' Response: The Six Cities take no position at this time with respect to potential hydro resource counting rules.

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.

Six Cities' Response: The Six Cities have no additional comments at this time on the straw proposal.