

**Stakeholder Process: New Pro Forma Agreement for
Resource Specific System Resources**

Summary of Submitted Comments

Stakeholders submitted two rounds of written comments to the CAISO on the following dates:

- Round One, 04/22/08
- Round Two, 06/06/08

Stakeholder comments are posted at: <http://www.caiso.com/1fac/1facad3d35ee0.html>

Other stakeholder efforts include:

- Conference Call: 04/24/08
- Conference Call: 05/29/08
- Project Manager and Stakeholder Affairs outreach

Management Proposal	Calpine Corporation	Pacific Gas and Electric Company	Southern California Edison	Reliant	Management Response
Require Resource-Specific System Resource (“RSSR”) owners to sign an agreement obligating them to comply with the CAISO Tariff in order to receive Bid Cost Recovery from the CAISO	Support Calpine supports the RSSR proposal and believes that the proposed tariff language is an important addition to the CAISO Tariff.	No Comment	Support SCE supports the CAISO’s proposal to require owners of RSSRs to enter into a pro forma contract with the CAISO.	Support Reliant would like to see the CAISO continue to move forward with this effort, since Reliant believes that it generally adds value to the overall market in the West.	Management appreciates the support of stakeholders for this proposal.
Require RSSR owners to provide SCADA data by telemetry to the CAISO’s EMS instead of Revenue Quality Meter Data			SCE supports the CAISO’s proposal to require owners of RSSRs to require the SC to provide telemetry data, rather than revenue meter data.		Management appreciates the support of SCE for this proposal.
	Calpine requests the CAISO provide clarification in the RSSR proposal to explicitly state that generators may offer both full and partial output from their generating units.				Management has added clarifying language to the proposed tariff language.
		RSSR owners should be subject to Uninstructed Deviation Penalties (UDP) if and when UDP is activated.			Management agrees in concept that penalties should apply when RSSR owners decline to honor submitted HASP bids to the CAISO. However, rather than address the theoretical application of UDP to RSSRs at this time, when the CAISO has not yet proposed to make UDP effective, the CAISO proposes to determine the extent to which UDP will apply to RSSRs during the stakeholder process for the development of any subsequent FERC filing to make UDP effective.
		Include language in the tariff to clearly indicate that RSSR owners must conform to all MRTU tariff			Management has added proposed tariff language to clarify those sections of the CAISO Tariff requiring such requirements apply to RSSR owners.

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		requirements that allow the CAISO to verify, inspect and test the capacity and operating characteristics of the resources.			
			SCE believes that RSSR owners should conform to the same CAISO Tariff requirements regarding Start-Up and Minimum Load, including Market Power Mitigation (MPM) that is currently proposed for these costs, as existing internal resources that participate in the CAISO market. SCE also believes that an RSSR owner's description of physical operating constraints of the RSSR must be consistent with the CAISO Tariff and indicative of the resources true operating constraints.		RSSR owners will be treated similarly to other resource owners participating in CAISO markets. CAISO Tariff provisions authorizing Market Power Mitigation and requiring that reported operating constraints reflect the true physical operating constraints of the resource are applicable to RSSR owners.