



# California ISO

## Response to Stakeholder Comments on Second Revised Draft Tariff Language Reliability Services Phase 1b and Phase 2

Tariff Section	Stakeholder Comment	ISO Response
9.3.1.3.3.1(b)	PG&E comments that this section reads oddly. PG&E further comments to state that the section seems to say that, for example, an RA resource with 100MW RA, on outage for 50MW, must provide 100MW substitute capacity. PG&E states that it shouldn't even have to provide the full 50MW (one would think; partial substitution (unless this was agreed)), but definitely not 100MW.	This section was drafted on the assumption of a total outage. The ISO has clarified the language to account for a partial outage.
9.3.1.3.4	The Six Cities comments that there is a typographical error and a word is missing.	The ISO will correct this error.
9.3.1.3.3.4(c)(2)	<p>The Six Cities proposes to create consistency of sub-section (c)(2) with sub-section (c)(3), and proposes the following re-wording:</p> <p>“The approved outage will be a Forced Outage but it will not be subject to...”</p> <p>PG&amp;E requests clarification regarding the period between 4 and 3 days, and asks why it does not say “less than four days prior to...?”</p>	<p>This ISO will make sub-section (c)(3) consistent with how sub-section (c)(2) is proposed.</p> <p>The language in question is existing tariff language. Standing application is the reference in this context to 4 days really means “at any point on the fourth day before” the outage.</p>
9.3.1.3.3.4(c)(3)	PG&E requests clarification regarding the period between 4 and 3 days, and asks why it does not say “less than four days prior to...?”	The language in question is existing tariff language. Standing application is the reference in sub-section (c)(3) covers an outage submitted at any point on the third, second, or first day before the day of the outage.



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40.3.2(a)	SDG&E comments that the draft tariff language is too broad and seems to allow LSEs to commit a lower amount of local resources during the year-ahead or annual process. SDG&E further states that if this is the case, then the draft tariff language is not consistent with the ISO's proposal	As SDG&E notes, the policy paper used the general terminology "monthly resource adequacy process" but the March 19, 2015, memorandum to the ISO Board stated: "In the monthly and annual RA process, the ISO proposes to cap a load serving entity's local capacity RA requirement at that load serving entity's system RA requirement." The focus of the policy was to address the impact of a LSE's varying local capacity requirements in different months of the year as compared to its static system requirement across the months of the year. That impact occurs in both the annual and monthly RA plan submission processes. Limiting this new rule to only the monthly RA plan process would add unneeded complexity to the RA process by imposing a higher local requirement on LSEs in the annual plan submission process only to relax those requirements in the monthly plan submission process.
40.7(a)	The ISO DMM states that the clause "but may take no other adverse action towards the insufficient Load Serving Entity" appears to be overly broad and unnecessary.	The ISO will propose to delete this language.
40.9.3.6.1	SDG&E recommends the ISO to clearly indicate that for planned outages submitted prior to T-25 and changed (increase in MW or duration) between T-25 to T-8, that the planned outage substitution evaluation is now considered as part of tariff section 40.9.3.6.2. This would provide sufficient time for SCs to procure and provide substitute capacity in the event a change is made at T-9.	The draft of section 40.9.3.6.1 already states: "For purposes of this section 40.9.3.6.1, the CAISO will treat any request to extend the scheduled duration of an outage or increase the MW amount of capacity on outage as a new outage request and will assign a new priority date based on when the request to change the outage or derate was submitted to the CAISO." This sentence would seem to address this concern. Draft sections 40.9.3.6.1 and 40.9.3.6.2 also defer the deadline to procure/provide substitute capacity to the



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		BPM. The ISO intends for the deadline to be T-8 with respect to the day when substitution would be required (not the RA month) under both sections 40.9.3.6.1 and 40.9.3.6.2. Because of the planned identical deadlines, the specific scenario of concern to SDG&E would not arise even without the above-quoted draft provision from section 40.9.3.6.1.
40.9.3.6.5(e)(2)	The Six Cities proposes correcting a tariff-cross reference.	The ISO made this correction.
43A.2.1.2	<p>PG&amp;E requests the ISO to point to where the topic quoted below was discussed during RSI 2 stakeholder process or approved in draft final proposal.</p> <p>“In no case is the CAISO authorized to designate CPM Capacity under this Section 43A.2.1.2 solely because a monthly Resource Adequacy Plan demonstrates procurement of a Local Capacity Area Resource that is on a Maintenance Outage at some point during the applicable month.”</p>	The topic was discussed in the RSI Phase 1 initiative.
43A.2.3	<p>PG&amp;E requests the ISO to point to where the topic quoted below was discussed during RSI 2 stakeholder process or approved in draft final proposal.</p> <p>“In no case is the CAISO authorized to designate CPM Capacity under this Section 43A.2.1.2 solely because a monthly Resource Adequacy Plan demonstrates procurement of a Local Capacity Area Resource that is on a</p>	The topic was discussed in the RSI Phase 1 initiative.



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	<p>Maintenance Outage at some point during the applicable month.”</p>	
43A.2.7.2	<p>PG&amp;E requests the ISO to point to where the topic quoted below was discussed during RSI 2 stakeholder process or approved in draft final proposal.</p> <p>“In no case is the CAISO authorized to designate CPM Capacity under this Section 43A.2.1.2 solely because a monthly Resource Adequacy Plan demonstrates procurement of a Local Capacity Area Resource that is on a Maintenance Outage at some point during the applicable month.”</p>	<p>The topic was discussed in the RSI Phase 1 initiative.</p>
43A.8.8	<p>PG&amp;E requests the ISO to point to where the topic quoted below was discussed during RSI 2 stakeholder process or approved in draft final proposal.</p> <p>“If the Local Regulatory Authority does not notify the CAISO of its allocation method by the deadline established in the relevant Business Practice Manual, then the CAISO allocates Flexible Capacity CPM costs using its default allocation methodology under Section 43A.8.8(b)(2).”</p>	<p>The topic was discussed in the RSI Phase 1 initiative. This topic was addressed in a different part of the draft tariff and was moved to this section in response to prior feedback from California Public Utilities Commission staff.</p>