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**To:** CAISO Tariff <[MRTUtariff@caiso.com](mailto:MRTUtariff@caiso.com)>  
**Subject:** NRG Energy, Inc. Comments on Black Start Tariff Language

< EXTERNAL email. Evaluate before clicking. >

Sorry these are late –

Section 8.8 (b)	(b) may be located anywhere in the CAISO Balancing Authority Area provided that the Black Start resource is capable of meeting the CAISO performance requirements for starting and <del>interconnection</del> <b>interconnecting</b> to the CAISO Controlled Grid; but
Section 11.10.8.1	<b>11.10.8.2 Black Start Capability</b> The CAISO shall allocate payments for Black Start capability under a Black Start Agreement as Reliability Services Costs to the Participating Transmission Owner <b>in whose Service Area in which</b> <del>where</del> the Black Start Generating Unit is located.
Appendix D, Section (d)	Each Black Start Generating Unit must be capable of sustaining its output for a minimum period of twelve (12) hours from the time when it first starts delivering Energy.  Question - does this minimum 12-hour energy requirement apply to the Black Start Generating Unit at all times, or only when the Black Start Generating Unit has been started up pursuant to a Black Start Exceptional Dispatch?
Appendix D, Section (g)	<b>No Load served by the Black Start Generating Unit may be restored until the CAISO has confirmed that the need for such Black Start service has passed.</b>  The Black Start Generating Unit would not be aware whether it was serving any other load, would it? Would this requirement not apply to the Scheduling Coordinator for the Black Start Generating Unit? Further, presumably, this would NOT include any station service load required to keep the Black Start Generating Unit in operation?  Could this be restated to read: <b>The Scheduling Coordinator for the Black Start Generating Unit shall not use the Black Start Generating Unit to serve any load other than station service load required by the Black Start Generating Unit until the CAISO has confirmed that the need for such Black Start service has passed.</b>

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