

Stakeholder Comments Template

Subject: Generated Bids and Outage Reporting for Non-Resource Specific RA Resources

Submitted by	Company	Date Submitted
Gifford Jung 604-891-6040	Powerex Corp.	January 8, 2010

This template has been created for submission of stakeholder comments on the following topics covered in the *Issue Paper* regarding the process for generated bids and outage reporting for non-resource specific system resources with Resource Adequacy contracts. The *Issue Paper* was posted on December 18, 2009 and a conference call to discuss the paper and answer questions was held on December 30, 2009. Upon completion of this comments template please submit it to GBiedler@caiso.com. Submissions are requested by close of business on January 8, 2009.

Powerex appreciates the opportunity to provide these comments.

Please submit your comments to the following questions for each topic in the spaces indicated.

1. The ISO has identified three potential methodologies for calculating generated bids for NRS-RA resources. They include a price-taker option, the LMP-based option, and a negotiated option. Please comment on your preferences or concerns with respect to these options.

Powerex would prefer the price-taker option for generated bids. It gives a market participant certainty on the generated bid in the event the market participant inadvertently neglects to submit a bid for the full RA obligation. Powerex notes a negotiated option would also provide certainty and would not object to that option.

Powerex does not believe the price-taker option would have any incremental impact on reliability. All RA resources have an obligation to be available to the CAISO and should have the necessary arrangements to deliver on those RA obligations.

2. Please provide any suggestions you have regarding what information should be used to inform the development of a negotiated bid for non-resource specific system resources.

Powerex has no comments at this time.

3. In keeping with the aim of treating NRS-RA resources as similarly as possible to resource-specific RA resources, the ISO proposes the adaptation of the forced outage reporting requirements for resource-specific resources. Please provide your comments on the proposed adaptation provided in the December 18th *Issue Paper*.

Powerex believes that providing this functionality would be useful to both the CAISO and market participants. Powerex also believes that the forced outage reporting for NRS-RA resources should be limited to only critical transmission paths.