

Powerex Corp.

Generated Bids and Unavailability for NRS-RA Resources Comments on Draft Final Proposal

Submitted By	Company or Entity	Date Submitted
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Powerex appreciates the opportunity to comment on the CAISO's Generated Bids and Outage Reporting for NRS-RA Resources Draft Final Proposal.

Powerex supports the CAISO's proposal and offers the following comments but remains extremely disappointed with the timeline to implement this Proposal.

Generated Bids

Powerex supports the CAISO's proposal to allow three options to generate bids: 1) Negotiated Option, 2) Price-taker plus GMC Option, and 3) LMP-based Option. As in previous comments, Powerex supports the Price-taker plus GMC Option on the assumption that the CAISO accepts the administrative burden to automatically update the GMC adder on an as required basis.

Outage Reporting

Powerex supports the CAISO proposal and strongly encourages the CAISO to integrate SLIC to all ISO systems by the 2012 RA Compliance Year (when Generated Bids is proposed to be implemented).

Powerex also urges the CAISO to provide clarity on the reporting requirements for NRS-RA Resources prohibited from bidding on "out-of-service transmission paths" prior to the implementation of this Outage Reporting proposal.

Subset-of-Hours

Powerex supports the CAISO's proposal to recognize RA contracts with different availability hours and to change the availability assessment to only include hours where the RA resource has a contractual obligation.