

Powerex Corp.

Generated Bids and Outage Reporting for Non-Resource Specific Resource Adequacy Resources Comments on Straw 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 Straw Proposal.

Powerex supports the CAISO's Straw Proposal for Generated Bids to provide the flexibility of a Negotiated Option and an LMP-Based Option. However as in previous comments, Powerex strongly suggests that the default for the Negotiated Option is a "price-taker bid" or \$0 per MW since it is not always possible to provide justification for the costs to supply energy from a NRS-RA Resource. The availability of this default would eliminate the need to negotiate with the Independent Entity.

Powerex does not object to the CAISO providing the LMP-Based Option as an alternative to the Negotiated Option but would strongly object if this was the only option. Also, Powerex would appreciate clarity in regards to the feasibility test the CAISO would use to trigger a fallback to the Negotiated Option from the LMP-Based Option. In addition, Powerex would like clarity on the rules, processes, and frequency that would be applied to Market Participants for switching between the two available Generated Bid Options.

Powerex has no objections to the CAISO's proposal on Outage Reporting and agrees the only valid reasons for outages would be under extraordinary circumstances in external or intermediate BAAs. However, Powerex suggests that SLIC should eventually be connected to all ISO systems that require the SLIC data and not limited to just the RAAM tool.

Powerex was pleased to learn on the stakeholder call that the CAISO is working on updating its software to reject bids on open ties and that NRS-RA Resources would not be required to report open ties via SLIC.

Powerex strongly suggests that the CAISO coordinate the proposed changes to the Standard Capacity Product in the various stakeholder initiatives so that there are not multiple changes to the RA program within months of each other. Powerex believes that where possible

implementation of proposed changes should be at the start of an RA compliance year and that mid-year changes should be minimized.