

Response to Stakeholder Comments
Generated Bids and Outage Reporting for NRS-RA Resources – Business Requirements Specifications
July 22, 2011

No.	Topic Area	Submitter (Name and Company)	Comment Submitted	ISO Response
1	BRS- Calculation of Generated Bids	Timothy J. Ferreira, Southern California Edison	<p>BRQ012: Any generated bid agreed upon by the ISO and a Scheduling Coordinator under the Negotiated Rate Option shall be filed at FERC within the first seven days of the next calendar month. The generated bid shall remain in effect unless:</p> <ol style="list-style-type: none"> 1. The generated bid is modified by FERC. 2. The generated bid is modified by mutual agreement of the ISO and a Scheduling Coordinator 3. The ISO or Scheduling Coordinator provides written notification that the generated bid is no longer acceptable for use under the Negotiated Rate Option. <p><u>Comment:</u> Who files the report with FERC?</p>	Market Participants shall continue to follow the same process they use for Default Energy Bids (DEBs) in regards to the Negotiated Rate Option.
2	BRS- Calculation of Generated Bids	Timothy J. Ferreira, Southern California Edison	<p>BRQ016: In cases where a contract specifies capacity quantities to be available from resources at multiple tie points, ISO systems must create LMP-based generated bids for each of the specific interties for day-ahead and HASP.</p> <p><u>Comment:</u> How does the CAISO plan to address multiple (mutually exclusive) resource IDs? For example, if an SC were to register 10 IDs which could be used to bring in power and then brings it all in on 4 of those IDs... how will the CAISO know to avoid generating bids on the other 6 IDs? Additionally, would the CAISO extend the bids on the 4 submitted IDs to the full RA amount?</p>	In the given example, the ISO shall insert ten generated bids.
3	BRS- Outage Policies for NRS-RA Resource	Timothy J. Ferreira, Southern California Edison	<p>BRQ024: NRS-RA resources shall have the opportunity to submit notices of unavailability through SLIC or an outage management system that replaces SLIC in the future.</p> <p><u>Comment:</u> Will adding all the NRS-RA Resource IDs to SLIC have a negative impact? Is the SLIC replacement capable of handling this as well?</p> <p>Note: NRS resources are by definition not resource specific and therefore the ID represents a scheduling ID not a resource ID.</p>	There are currently less than 100 NRS-RA resources. SLIC currently accounts for these resources, but the outages do not flow to the market systems (they are flagged specially). The change to recognize these resources within SLIC will have no impacts.
4	BRS- Monthly	Timothy J.	BRQ033: System must provide a secure mechanism for SCs to upload only their annual/monthly Supply/RA	The ISO has provided responses to the

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	and Annual RA External User Interface	Ferreira, Southern California Edison	<p>Plan data in a predefined template format.</p> <p><u>Comment:</u> Concerning the “predefined template format” reference in this specification, SCE still has many questions/comments on the template format, which are outlined in the section below entitled “Comments on the Template Presentation.”</p>	“Comments on the Template Presentation” in the below sections.
5	BRS- Monthly and Annual RA External User Interface	Timothy J. Ferreira, Southern California Edison	<p>BRQ041: System must provide a mechanism so that all SC submitted files that fail validation are returned to the SC with an error message indicating the error causing the rejection.</p> <p><u>Comment:</u> Consider rewording this requirement to read “... with an error message which includes enough detail to allow the SC to correct the error causing rejection.” One lesson learned from the Master File GUI (which is very similar in nature) is that the public error messages are not very descriptive and require many phone calls to the CAISO to have the non-public error message conveyed. Before finalizing the error messages please consider if the message is providing enough information for the participant to fix the problem or if they will need to call the CAISO for additional information.</p>	Current System Requirement document states error message as descriptive as possible.
6	BRS- Considerations for Standard Capacity Product (SCP)	Timothy J. Ferreira, Southern California Edison	<p>BRQ046: A resource shall be deemed less than 100% available in a given month if it has reported outages or derates that impact the availability of the resource during the availability assessment hours of that month. (Existing business rule)</p> <p><u>Comment:</u> SCE assumes that only forced outages will count against SCP availability. How will the CAISO handle planned outages entered by the participant? Will this be the same method used for ties which have a zero MW OTC? SCE agrees with the comments made by PowerEx concerning the confusing/conflicting instructions from the CAISO regarding how to handle intertie resources in relation to SCP – especially under zero MW OTC conditions.</p>	Please refer to Appendix C of the Generated Bids and Outage Reporting for NRS-RA Resources Business Requirements Specification document version 1.1 for clarification.

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7	BRS- Considerations for Standard Capacity Product (SCP)	Timothy J. Ferreira, Southern California Edison	<p>BRQ049: Unit substitution provisions shall pertain to NRS-RA resources. NRS-RA resources shall be able to substitute with non-RA capacity internal to the ISO's Balancing Authority Area.</p> <p><i>Business Rule: In the event that these types of resources have circumstances that would affect their availability, the Scheduling Coordinator may request to substitute a non-RA resource that is internal to the ISO BAA to be used in place of the original resource.</i></p> <p><u>Comment:</u> SCE continues to request the CAISO to provide a reason why NRS-RA resources could not be substituted with other NRS-RA if the market participant has obtained the appropriate intertie import rights. (If this requirement is changed it may result in the need to discuss how to generate a bid for non-RA NRS system resources – SCE suggests a default of the price taker option.)</p>	This portion of policy did not change with respect to this project. For further information, please refer to FERC 131 paragraph 16.
8	BRS- Considerations for Standard Capacity Product (SCP)	Timothy J. Ferreira, Southern California Edison	<p>BRQ053: NRS-RA resources shall not be included in the grandfathering provisions.</p> <p><u>Comment:</u> SCE is a bit unclear if this requirement truly means that all NRS-RA resources will not be including in the grandfathering provisions or only those which were signed after the original grandfathered date? Will the current CAISO approved grandfathered list remain in effect?</p>	NRS-RA resources shall not be granted any additional grandfathering provisions. The current ISO approved grandfathered list shall remain in effect.
9	BRS- Market Monitoring and Reporting	Timothy J. Ferreira, Southern California Edison	<p>BRQ054: The ISO shall cross check information against the RA showing (RA Plans vs. Supply Plans) submitted by the LSE, and any discrepancy could trigger review of the contract.</p> <p><u>Comment:</u> SCE is unclear on how many plans/templates are now being submitted, who is submitting them, when they are due, and who they are being submitted to. Could the CAISO please provide some clarity around this? The current proposal seems to create a number of additional plans that could pose a significant operational burden.</p>	This requirement is an internal requirement. Scheduling Coordinators shall continue to submit RA/Supply Plan templates using the same format.

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10	BRS- Market Monitoring and Reporting	Timothy J. Ferreira, Southern California Edison	<p>BRQ055-56: Develop Monthly and Annual reports or queries for each Load-Serving Entity (LSE) individually and all LSEs in total. The ISO shall monitor the type and amount of RA capacity in the Maximum Cumulative Capacity (MCC) Bucket categories. Enable the preparation of reports as shown in Table 2 below per MCC definitions shown in Table 1.</p> <p>See Table 1: The Maximum Cumulative Capacity (MCC) Bucket Definitions. Staff must have the ability to modify the reports or queries to reflect policy changes. For example, the number and ranges of the MCC Buckets may change over time.</p> <p>See Table 2: Sample Monthly and Annual Report Format for Each LSE Individually and All LSEs in Total: Resource Portfolio Categorization by Maximum Cumulative Capacity (MCC) Bucket.</p> <p><i>Business Rule: This report should be produced on a monthly.</i></p> <p>The ISO shall also monitor the total amount of RA capacity that is subject to inserted bids, whether market participants are compliant in submitting bids for RA resources for which the ISO does insert bids, and whether market participants are compliant in submitting bids for use-limited resources for which the ISO does not insert bids.</p> <p><i>Business Rule: This report should be produced on a monthly.</i></p> <p><u>Comment:</u> What is the visibility of these reports? CAISO? CPUC? FERC? SC? LSE?</p>	CAISO
11	BRS- Market Monitoring and Reporting	Timothy J. Ferreira, Southern California Edison	<p>Table 1 (page 20):</p>	Use Limited

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			<p style="text-align: center;">Table 1: Maximum Cumulative Capacity (MCC) Bucket Definitions</p> <table border="1"> <thead> <tr> <th>MCC Bucket</th> <th>Min Hours Per Month</th> <th>Max Hours Per Month</th> <th>Applicable Months</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>30</td> <td>159</td> <td>May</td> </tr> <tr> <td>1</td> <td>40</td> <td>159</td> <td>June, July, Sept</td> </tr> <tr> <td>1</td> <td>60</td> <td>159</td> <td>August</td> </tr> <tr> <td>2</td> <td>160</td> <td>383</td> <td>All Months</td> </tr> <tr> <td>3</td> <td>384</td> <td>Less Than 7x24</td> <td>All Months</td> </tr> <tr> <td>4</td> <td>7x24</td> <td>7x24</td> <td>All Months</td> </tr> </tbody> </table> <p><u>Comment:</u> This does not seem to be a complete set of RA contracts. For example, what bucket covers a contract with less than 160 hours on October?</p>	MCC Bucket	Min Hours Per Month	Max Hours Per Month	Applicable Months	1	30	159	May	1	40	159	June, July, Sept	1	60	159	August	2	160	383	All Months	3	384	Less Than 7x24	All Months	4	7x24	7x24	All Months	
MCC Bucket	Min Hours Per Month	Max Hours Per Month	Applicable Months																													
1	30	159	May																													
1	40	159	June, July, Sept																													
1	60	159	August																													
2	160	383	All Months																													
3	384	Less Than 7x24	All Months																													
4	7x24	7x24	All Months																													
12	Comments on the Template Presentation – Slide 8	<i>Timothy J. Ferreira, Southern California Edison</i>	<u>Comment:</u> Compliance year and month comments are switched on template.	Noted and corrected.																												
13	Comments on the Template Presentation – Slide 9	<i>Timothy J. Ferreira, Southern California Edison</i>	<u>Comment:</u> Where would a phone extension go?	Not in scope, but noted.																												

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14	Comments on the Template Presentation – Slide 10	<i>Timothy J. Ferreira, Southern California Edison</i>	<p><u>Comment:</u></p> <ol style="list-style-type: none"> 1. Why is the contract number being added to the template? 2. Why do we require LSE name on slide 8 and LSE SCID on slide 10. Could these be combined into one field? 3. SCE assumes that the CAISO is expecting a row of data for each continuous block of RA capacity. For example, if a resource sold 100MW 7x24 for the month of April then only one line of data would exist with a start and end date of 4/1/2012 and 4/30/2012. However, if the resource only sold 7x16 then there would be 30 rows of data (one for each day) starting each day at HE7 and completing at HE22. Can the CAISO confirm or correct this assumption or provide a sample template with data? 4. Will the template use clock time or HE? 	<ol style="list-style-type: none"> 1. The Resource Capacity Contract Number has always been part of the Supply Plan template. Resource Capacity Contract Number – Number that identifies the relevant contract(s) as determined by the entities that entered into a Resource Adequacy contract. This information will be used during compliance validation. It is recommended that the Load Serving Entity and the Generating Unit agree on the same Resource Capacity Contract Number. 2. The ISO would require, at the minimum, the SCID for either/both the SC for the Supplier and SC for the LSE. 3. The assumption is correct. The data would be entered as contiguous blocks of time. 4. Clock time
15	Comments on the Template Presentation –	<i>Timothy J. Ferreira, Southern</i>	<p><u>Comment:</u></p> <ol style="list-style-type: none"> 1. Why is the contract number being added to the template? What purpose is this intended to 	<ol style="list-style-type: none"> 1. This has been part of the RA Plans submitted by the Non-CPUC LSEs. Resource Capacity Contract Number:

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	Slide 11	<i>California Edison</i>	<p>serve?</p> <p>2. Does the CAISO expect the Resource Capacity Contract Number to be unique across SCs? How will this be enforced? Why is the Resource/Scheduling ID not sufficient to perform validations?</p>	<p>LSE specified number that identifies the relevant contract(s). This information will be used during compliance validation. Its purpose shall be described in bullet two below. It is recommended that the Load Serving Entity and the Generating Unit agree on the same Resource Capacity Contract Number.</p> <p>2. The system needs a way to discriminate between multiple contracts on a single resource. The Resource/Scheduling ID is not sufficient because there may be multiple contracts for a particular resource, especially with the subset of hour's functionality this changes. Suppose a resource is contracted for 50 MW on a 7x24 contract and an additional 25 MW is contracted on a 5x16 contract on the same resource. In the current system 75 MW would be reported for the entire month, but with subset of hours they will be tracked as</p>
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				two separate values. The Resource Capacity Contract Number allows the system to track the two contracts separately.
16	Comments on the Template Presentation – Slide 12	<i>Timothy J. Ferreira, Southern California Edison</i>	<u>Comment:</u> Does this telephone field allow phone numbers with extensions?	Not in scope, but noted.
17	Comments on the Template Presentation – Slide 13	<i>Timothy J. Ferreira, Southern California Edison</i>	<u>Comment:</u> Please further describe the Local Attribute Transfer data element and provide a reference to BPM or Tariff language so we can better understand this.	The Local Attribute Transfer data element is described in the Instructions tab of the Annual Local RA template posted on the CAISO website. This is the template that is currently used by Non-CPUC jurisdictional LSEs. These data elements allow for an LSE who is “Long” on Local RA in a given Local Area to sell excess local capacity to an LSE who is “Short” in the same area. Currently this is at the TAC Area level. While the ISO would have no issue with any LSE availing themselves of this ability, CPUC jurisdictional LSEs are not permitted to trade local

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				capacity attributes per CPUC Decision D.06-06-064 Section 3.3.9 The IOUs' Transfer Payment Proposal (Staff Report I. B. 8.)
18	<i>BRS- General Question</i>	<i>Timothy J. Ferreira, Southern California Edison</i>	<u>Comment:</u> If a NRS-RA resource is not picked up in IFM does it have an obligation to bid into HASP/RTM? If such a resource is picked up for an amount less than full IFM, does it have the obligation to bid the remainder in HASP/RTM?	a). No. It's offer obligation is only in the IFM. b). No. However, if they are picked up in the IFM, they have to bid that RA capacity into HASP.