

SDG&E supports the CAISO's proposal to improve the process for Generated Bids and Outage Reporting for Non-Resource Specific RA Resources. SDG&E offers its comments to the CAISO in developing a more robust User Interface for all stakeholders.

SDG&E provides comments on the business requirement for sections 4.1 to 4.4

NRS-BRQ002 and NRS-BRQ014: SDG&E disagrees with this methodology. Setting the bid to be the GMC is antithetical to the term "price-taker".

NRS-BRQ012: The Scheduling Coordinator should be able to update the negotiated bid based on changes in the supply resource. This would avoid the need to setup up multiple Intertie Resource IDs at each tie point.

NRS-BRQ024: Any outage management system must have the ability for scheduling coordinators to flag a forced outage due to transmission. Transmission outages should not be counted against the NRS-RA Resource's unavailability as it is not a resource issue but rather a transmission issue. NRS-BRQ025: How will transmission outage data in SLIC be applied to NRS-RA bid quantities? Would it be pro rata or other mechanism?

For sections 4.5

NRS-BRQ030: SDG&E strongly opposes this business requirement. Currently, CAISO does not require executive attestation for any other Supply Plan-related submittals. Scheduling Coordinators are already obligated under the CAISO Tariff to provide accurate information on its resources. Imposing this requirement for each RA contract, each year and for each change in contractual terms would be administratively prohibitive.

Section 4.6

SDG&E believes this section merits its own stakeholder process. This proposed section has wide ranging scope and does not only affect NRS-RA Resources. SDG&E believes that the new system should be technologically robust and integrated with other CAISO systems to allow for data transfer, for example with SLIC, RAAM and SIBR. SDG&E strongly supports the development of an API to enable market participants to automate future workload and integrate within their current processes.

The CAISO has "noted that this hourly capability will not alter the current annual and monthly compliance standards "(pg 5). SDG&E strongly urges the CAISO to work with the CPUC to design a system that *would* alter the current annual and monthly processes, by developing a system that can enable hourly RA compliance in order to improve market efficiency and reduce administrative burden. SDG&E also believes that moving to an hourly compliance would resolve the outage counting discrepancy between the CPUC and CAISO methodologies

NRS-BRQ034 – NRS-BRQ037: If the form of electronic submission of the RA Plans is xls or xlsx, any changes to the existing spreadsheet should be coordinated with the CPUC so that LSEs do not need to create two separate RA Plan filings, one for the CPUC and one for the CAISO interface.

NRS-BRQ040: SDG&E supports compatibility with csv and xml formats.

SDG&E proposes the new system include an interface for SCs to nominate resources under contract but not submitted for RA. As the CAISO knows well, SCP allows for unit substitution. This interface section would help notify the CAISO during both the annual and monthly processes with a list of resources under contract but not for RA. The system could also interface with RAAM to let SCs know which resources are non-RA so that SCs can easily contract for unit substitution.

CAISO should also consider expanding this system to allow SCs to upload other useful templates such as Use Limited Resources or SCP I and II Grandfathering Update Templates. SDG&E strongly suggest to take this section to a new stakeholder process so that the scope can be expanded to develop a more useful tool.

#### Section 4.7

NRS-BRQ046: Section 4.4 mentioned transmission outages measured as NRS-RA unavailability. Please clarify if that is true. For internal resources, transmission outages are not counted.

NRS-BRQ047 & NRS-BRQ048: Availability standards and SCP revenue allocations for NSR-RA resources should be equivalent to internal generators.

NRS-BRQ052: NRS-RA Resources with a subset of hours contracts that do not meet the assessment hours should not be allowed to be included as an RA resource.

#### Section 4.8

NRS-BRQ054: The CAISO should only cross check whether or not the supply plan is less or equal to the maximum NQC and what is listed on the LSE's RA Plan. If the Supply plan NQC is greater than the Maximum NQC, or if the LSE listed on the Supply Plan differs from the RA Plan, then validation should fail.

NRS-BRQ055: The MCC buckets are not a requirement of the CAISO but the CPUC. The CPUC already validates this so it is not necessary for the CAISO to have this requirement. The CAISO has its own method to track use limited resources. Going to an hourly supply plan or RA requirement would explicitly track conformance with the MCC buckets the CPUC requires.