

**COMMENTS OF THE CITIES OF ANAHEIM, AZUSA, BANNING, COLTON,
PASADENA, AND RIVERSIDE, CALIFORNIA ON THE DRAFT TARIFF LANGUAGE
FOR THE FLEXIBLE RAMPING PRODUCT**

In response to the ISO’s request, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the “Six Cities”) submit the following comments on the ISO’s draft tariff language for the Flexible Ramping Product (“FRP”), posted on April 27, 2016. All line references are to lines as shown in the posted redline.

§ 11.25.1	With respect to sub-sections 11.25.1.1.1 and 11.25.1.1.2, please explain why FRDP would be used in settling upward Forecasted Movement? Similarly, with respect to sub-sections 11.25.1.2.1 and 11.25.1.2.2, why would FRUP be used in settling downward Forecasted Movement? Is it not the case that Forecasted Movement for a particular resource occurs in only one direction within a given interval? If that is so, it would seem that only FRUP would apply to upward Forecasted Movement, and only FRDP would apply to downward Forecasted Movement.
§ 11.25.1.3	Please explain the source or sources of any residual Forecasted Movement settlement amounts.
§ 11.25.1.3	In the second line, change “the Section 11.25.1 to Scheduling Coordinator metered” to “Section 11.25.1 to each Scheduling Coordinator’s metered”.
§ 11.25.1.3	In the third line, insert “of” after “share”.
§ 11.25.2.3.2(a)(2)	In the first line, change “Resource” to “Resources” and change “schedule” to “schedules”.
§ 11.25.2.3.4(a)(2)	In the second line, delete “to” after “Section 11.25,”.
§ 11.25.2.3.4(d)	In the fifth line, change “ration” to “ratio” and change “its” to “their”.
§ 29.34(l)(4)(A)	In the fourth line, change “minute” to “minutes”.
§ 29.34(l)(4)(A)	In the fifth and sixth lines, add “capacity requirements of the” before “Balancing” and change “EIM Area’s capacity requirements” to “EIM Area”.

§ 29.34(m)(5)	In the eleventh line, insert “and” before “will”.
§ 44.3.1	In the second and third lines, to make clear that all Forecasted Movement calculations are made on an individual resource basis, change “System Resources” to “System Resource”; change “Pseudo-Ties” to “Pseudo-Tie”; change Non-generating Resources” to “Non-generating Resource”; and change “PDRs” to “PDR”.
§ 44.3.1.1	In the fourth line, change “it’s” to “its”.
§ 44.3.1.2	In the second and third lines, insert “the” before “difference” and before “first”.
Definition of Forecasted Movement	Change “resources” to “resource’s”.

Submitted by,

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