

August 5, 2021

Comments of the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside,
California on Proposed Tariff Clarifications

The Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the “Six Cities”) hereby submit their comments on the CAISO’s proposed tariff clarifications posted on July 22, 2021.

The Six Cities generally support the CAISO’s proposed tariff revisions to clarify usage of the term “business day” in various sections of the CAISO Tariff versus the term “Business Day” as defined in Appendix A of the Tariff. The revisions to Tariff Sections 11.29.7, 11.29.8, 11.29.10, and 11.29.24 as proposed by the CAISO clarify that the term “business day” as used in those sections means any day on which the CAISO is open for business, while the term “Business Day as defined in Appendix A of the Tariff excludes all federal holidays, whether or not observed by the CAISO. The Six Cities, however, recommend two enhancements to the clarifications that will assist stakeholders in understanding the distinction and confirming which term is applicable in a specific instance.

First, the Six Cities recommend that in the revised language for Sections 11.29.7, 11.29.10, and 11.29.24, references to “the Business Practice Manual” specify the relevant Business Practice Manual (“BPM”). A generalized reference to “the Business Practice Manual,” particularly for this type of information, leaves stakeholders to guess which of twenty-four BPMs is most likely to contain the current list of affected holidays and potentially will require a search of multiple BPMs to locate the information.

Second, in order to reinforce the distinction between the usage of the two terms, especially for stakeholders that may turn initially to the Appendix A definition, the Six Cities recommend that the CAISO also supplement the definition of the term “Business Day” in Appendix A by adding the following two sentences: “The undefined term ‘business day’ as used in some sections of the tariff means all days on which the CAISO is open for business, including several holidays which are federally recognized but remain regular operation days for the CAISO. Please see the Business Practice Manual for [Title of the relevant BPM] for the most current list of affected holidays.”

Submitted by,

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