

March 4, 2016

COMMENTS ON BEHALF OF THE CITIES OF ANAHEIM, AZUSA, BANNING, COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA ON THE DRAFT TARIFF LANGUAGE FOR BIDDING RULES ENHANCEMENTS MINIMUM LOAD COSTS

In response to the ISO's request, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the "Six Cities") submit their comments regarding the ISO's February 19, 2016 draft tariff language for Bidding Rules Enhancements Minimum Load Costs:

§ 11.8.3.1.2	In the second line, the reference should be to § 30.7.10.2.
§ 11.8.4.1.2	In the third line, the reference should be to § 30.7.10.2.
§ 31.4	In the fourth line, there appears to be something missing after the word "level." The word "between" is used in the line, but there is no reference to a second value.
Definition of FMM Derate Energy	In the fifth line, there appears to be something missing after "PMax." The phrase "higher of" is used in the line, but there is no reference to a second value.
Definition of Minimum Load Costs	In the last line, change "maybe as" to "may be."
Definition of RTD Derate Energy	In the sixth line, there appears to be something missing after "Schedule." The phrase "lower of" is used in the line, but there is no reference to a second value.
Definitions of Start-Up, On, and Off	In some tariff sections (<i>e.g.</i> , §§ 11.8.2.1.2(e) and (f)), the term "On" is used to refer to production relative to Minimum Load. Several of the proposed tariff revisions, however, delete references to Minimum Load in determining whether a resource is On or Off (<i>e.g.</i> , §§ 11.8.3.1.1(f) and 11.8.4.1.1(f)). Further, the definition of "Start-up" relies on the defined terms "Off" and "On." It is both confusing and likely to give rise to disputes to use the same terms to describe different conditions. The Six Cities recommend that the ISO make

the definitions and the use of the defined terms consistent throughout the Tariff.

Submitted by

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