

Stakeholder Comments Template

**Resource Transitions**

*Resource Adequacy Deliverability Assessment  
for Resources Transitioning  
from Outside to Inside the ISO Balancing Authority Area*

Submitted by	Company	Date Submitted
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This template is for submission of stakeholder comments on the topics listed below, covered in the Resource Transitions Straw Proposal posted on March 24, 2011, and issues discussed during the stakeholder conference call on April 1, 2011, including the slide presentation.

Please submit your comments below where indicated. Your comments on any aspect of the Resource Transitions initiative are welcome. If you provide a preferred approach for a particular topic, your comments will be most useful if you provide the reasons and business case.

Please submit comments (in MS Word) to [ResTrans@caiso.com](mailto:ResTrans@caiso.com) no later than the close of business on April 8, 2011.

1. Do you have any concerns with the straw proposal, and if so please describe.

The Six Cities have identified a concern with implementation of the method set forth in the straw proposal where the transitioning resource is associated with a long-term, grandfathered import allocation to an LSE that owns or purchases the output of the resource. If the resource itself is granted full deliverability for the amount of capacity documented in historic imports, then any long-term grandfathered import allocation associated with that resource should be reduced by the same amount.

2. The ISO has proposed specific criteria to qualify for a resource transition as described in the straw proposal. Do you have any concerns with the proposed criteria, and if so please describe.
3. The ISO has proposed to determine historical deliveries associated with resource transitions based on (1) tags and metered output data, or (2) if tags are not available or clear, the power purchase agreement contract and metered output

data. Do you have any concerns with these approaches, and if so please describe.

4. If you have any additional comments, please provide them here.