

## Response to Stakeholder Comments on Draft Tariff Language Black Start and System Restoration Phase 2

Tariff Section	Stakeholder Comment	Explanation of Change
General	Six Cities comments that the draft tariff language does not include any description of the procedure for Black Start procurement. Six Cities believe that the tariff should include a description of the Black Start procurement procedure.	The ISO has existing tariff authority to contract for Black Start. The ISO plans to explain the procurement procedure it plans to undertake in its request for offers to provide incremental Black Start capability. Similar to a Reliability Must Run Agreement, any Black Start Agreement will be filed with the Federal Energy Regulatory Commission by the seller and reflect cost of service rates.
4.9.4.5	Six Cities requests an explanation for the deletion of the current language in this section.	The ISO's system restoration plan is developed to comply with NERC Reliability Standard EOP-005-02 does not recognize the ability of an MSS operator to self-provide Black Start. Black Start Generating Units incorporated into the system restoration plan are subject to Black Start Agreements. The language in Section 4.9.4.5 language reflects the possibility that the ISO would operate an auction market for Black Start service.
8.1	<p>Six Cities requests an explanation for deletion of “(iv) Voltage Support” from the third line from the top of page 2 and note that Section 8.3.5 continues to address Voltage Support.</p> <p>PG&amp;E seeks clarification on the change to strike Voltage Support from the list of Ancillary Services referenced in Sections 8.1 and</p>	The ISO has modified its draft tariff changes to leave references to Voltage Support in Section 8.1. Voltage Support (like Black Start) is not an Ancillary Service that the ISO market procures through its Day-Ahead and Real-Time market or that scheduling coordinators self-provide through these markets. However, this initiative focuses on Black Start and the ISO. The ISO may make additional tariff clarifications to reflect the

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	<p>11.10.2. PG&amp;E seeks to understand whether this deletion is due to a policy change with respect to the provision and compensation for resources providing Voltage Support or is merely an incidental tariff clean-up item.</p>	<p>fact that Voltage Support is not an Ancillary Service the ISO procures through its markets. The ISO made similar changes in a 2013 tariff clarification filing. (See FERC Docket ER13-1274.)</p>
<p>8.2.3.4.1 and 8.2.3.4.2</p>	<p>Six Cities comments that the draft tariff language does not propose to modify existing Section 8.2.3.4, but many or most other references to Black Start service in earlier subsections of Section 8 are being deleted or moved to Section 8.8 or Appendix D. The Six Cities request that the ISO provide an explanation for the guiding objectives or approach underlying the proposed deletions and/or relocations of existing tariff language in Section 8.</p>	<p>The ISO has moved language from these tariff sections to a new Section 5 and Appendix D in an effort to consolidate tariff language related to Black Start.</p>
<p>8.3.1</p>	<p>With respect to the proposed deletion of the next to last sentence in the section (appearing on page 5 of the draft), the Six Cities recommends leaving the language in place or, alternatively, including the language in Section 8.8.1. <b>[Note:</b> This tariff language states that the ISO will procure Black Start capability through individual contracts with scheduling coordinators for Reliability Must Run Units and other Generating Units that have Black Start capability.]</p>	<p>The ISO has proposed similar language in Section 5 that states: “The CAISO shall contract annually (or for such other period as the CAISO may determine is economically advantageous) for Black Start services.” This contracting authority could use Reliability Must Run contracts or Black Start Agreements.</p>



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8.8(b)	<p>NRG recommends the ISO make the following change:</p> <p>may be located anywhere in the CAISO Balancing Authority Area provided that the Black Start resource is capable of meeting the CAISO performance requirements for starting and <del>interconnection</del> <b>interconnecting</b> to the CAISO Controlled Grid; but ...”</p>	The ISO will make this change.
8.9.13	Six Cities requests an explanation for the proposed deletion of this section, as performance audits for Black Start services do not appear to be addressed elsewhere in the draft tariff language.	The ISO has deleted tariff language related to performance audits of Black Start Generating Units because the requirements to test Black Start resources are included in a system restoration plan that is part of NERC Reliability Standard EOP-005-2. The ISO’s responsibility to test these resources and monitor performance during a Black Start event are also set forth in proposed tariff Section 5.3. If a Black Start Generating Unit does not provide Black Start during a Black Start event, the Black Start Agreement and ISO tariff will govern available remedies.
11.10.8.1	<p>NRG recommends the ISO make the following changes:</p> <p>The CAISO shall allocate payments for Black Start capability under a Black Start Agreement as Reliability Services Costs to the Participating Transmission Owner <b><u>in whose Service Area in which</u></b> <del>where</del> the Black Start Generating Unit is located.</p>	The ISO will make this recommended changes.



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Appendix A Definition of Interim Black Start Agreement	Six Cities comments that in light of the proposed revisions to the text of the definition, that the word “Interim” be deleted from the title of the definition.	The ISO will make this change.
Appendix A Definition of Reliability Services Costs	Six Cities recommends changing the last sentence of the definition to read as follows (underlined text reflect additions) “Reliability Services Costs include costs charged by the CAISO to a Participating TO associated with service provided under a Reliability Must-Run Contract, <u>or a Black Start Agreement, as well as</u> . . . .”	The ISO will make this change.
Appendix D	<p>NRG seeks clarification regarding the following language:</p> <p>“Each Black Start Generating Unit must be capable of sustaining its output for a minimum period of twelve (12) hours from the time when it first starts delivering Energy.” In particular, NRG requests clarification in that does this minimum 12-hour energy requirement apply to the Black Start Generating Unit at all times, or only when the Black Start Generating Unit has been started up pursuant to a Black Start Exceptional Dispatch? NRG asks if the requirements of Appendix D (12 hours) and the CAISO’s technical specification document (48 hours) should be the same.</p>	The minimum 12 hour run time identified in Appendix D relates to when the Generating Unit is dispatched pursuant to a Black Start Exceptional Dispatch. The minimum operation time for a Black Start Generator is currently 12 hours under the ISO tariff. The ISO may propose a longer minimum operating time as part of an individual Black Start Agreement to support the ISO’s system restoration plan.



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Appendix D Section (g)	<p>NRG comments that the proposed changes to the ISO tariff state “No Load served by the Black Start Generating Unit may be restored until the CAISO has confirmed that the need for such Black Start service has passed.”</p> <p>NRG requests clarification in regards to the Black Start Generating Unit not being aware whether or not it was serving any other load. NRG asks if this requirement would not apply to the Scheduling Coordinator for the Black Start Generating Unit. Further, NRG seeks clarification if this would not include any station service load required to keep the Black Start Generating Unit in operation.</p> <p>NRG requests if this language could be restated to read: “The Scheduling Coordinator for the Black Start Generating Unit shall not use the Black Start Generating Unit to serve any load other than station service load required by the Black Start Generating Unit until the CAISO has confirmed that the need for such Black Start service has passed.”</p>	<p>The ISO incorporated this language from existing tariff section 8.4.2. The ISO believes that NRG’s restatement improves the existing tariff language. The ISO will make this change.</p>