

**Comments of Viasyn
FERC Order No. 764 Transitional Protective Measures for Participating
Intermittent Resources -- Draft Tariff Language**

Submitted by	Company	Date Submitted
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Introduction

Viasyn appreciates the opportunity to offer these comments on the CAISO's FERC Order No. 764 Revised Draft Tariff Provisions related to Transitional Protective Measures for Participating Intermittent Resources.

Viasyn supports the Draft Tariff Language with the following clarification.

Section 11.12.1.1 Hourly Settlement

We request that the CAISO clarify the last sentence of this section, which disqualifies a resource from PIRP Protective Measures if the Scheduling Coordinator submits an economic bid in the Real-Time Market. Does the CAISO intend that the resource be disqualified for only the hour in which an economic bid is submitted, or that the resource be disqualified for the remainder of the term of the measures? It appears that the CAISO intends the latter case, as providing these resources with the hourly option to provide economic bids is not in the spirit of the proposal, however the second portion of the sentence which references ineligibility to receive "Bid Cost Recovery related payments" introduces additional confusion. If the submission of economic bids disqualifies the resource from protective measures for the remainder of the term, which implies that the requirements of the affidavit have been met, the resource should be treated as any other PIR/EIR.

We appreciate any clarity that the CAISO can provide on the intent of this sentence. We recommend that the sentence be modified to state that any economic bids submitted are invalid, with a separate clause identifying the step to be taken to be explicitly removed from protective measures.