

**Stakeholder Process:**  
**Decision on Outage and Forecasting Modifications for Eligible Intermittent**  
**Resources**

**Summary of Submitted Comments**

Stakeholders submitted two rounds of written comments to the CAISO on the following dates:

- Round One – March 16 – April 17, 2009
- Round Two – June 26, 2009

Stakeholder comments are posted at: <http://www.caiso.com/1817/181783ae9a90.html>

Other stakeholder efforts include:

- Conference Calls
  - February 2, 2009
  - March 2, 2009
  - April 24, 2009
  - June 26, 2009
- Conference Calls related to Wind and Solar Forecasting Equipment and Communications Technical Standards
  - November 25, 2008
  - December 19, 2008
  - January 16, 2009
  - February 12, 2009
  - March 2, 2009

- April 24, 2009
  - June 26, 2009
  - August 14, 2009
  - September 15, 2009
  - September 29, 2009
- 
- Written Comments on Wind and Solar Forecasting Equipment and Communications Technical Standards
    - December 16, 2008
    - March 16, 2009
    - June 26, 2009
    - August 31, 2009
    - September 21, 2009

Management Proposal	CalWEA	EON/NextEra	OptiSolar, Viasyn, and SCE	Management Response
<p>Reduction of the threshold for eligible intermittent resources (EIRs) to report forced outage from 10 MW to 1 MW.</p>	<p>Identify Response: Conditional Support</p> <p>Can support the change provided that the ISO (1) establishes an automated interface between plant SCADA systems and the ISO SLIC system and (2) exempts smaller EIRs with less than 10 MW total capacity.</p>	<p>Identify Response: Oppose</p> <p>Believe that lowering the threshold imposes an unreasonable burden and proposed establishing the threshold at 10% of the EIRs's total capacity.</p>	<p>Identify Response: Support</p> <p>Viasyn noted that they currently report forced outages down to 1 MW.</p>	<p>Management has explained that there is an automatic system to report MW availability and assisted scheduling coordinators in establishing the communication protocol.</p> <p>Management's proposal exempts EIRs smaller than 10 MW in total capacity. Management supports the proposal based on the following: (1) an existing scheduling coordinator employs a similar practice; (2) the ISO anticipates a large amount of smaller solar pv (e.g., 500 MW in SCE territory alone); and (3) not having the MW availability for forecasting and scheduling could impact reliability and cause cost shifting.</p>
<p>Extension of the forecast fee beyond Participating Intermittent Resources to applicable EIRs.</p>	<p>Identify Response: Oppose</p> <p>The ISO includes in its operating budget many activities, including load forecasting, related to reliability. The forecast fee therefore should not apply to EIRs not voluntarily electing to receive the benefits of the Participating Intermittent Resource Program.</p>	<p>No comment</p>	<p>Identify Response: SCE Support</p>	<p>Given the need for approximately 8,000 to 9,000 MW of additional renewable resources to achieve the 20% RPS goal, the lack of visibility of anticipated production from such resources presents an unacceptable operational risk.</p> <p>Given this risk, the ISO concluded that resources with intermittent characteristics should be responsible for general forecasting costs. Moreover, with the anticipated increase in intermittent resources, the pro rata cost borne by each resource should be significantly reduced over time under the current formula for calculating the forecast fee.</p>