

Stakeholder Process: Generated Bids and Outage Reporting for NRS-RA Resources

Summary of Submitted Comments

Stakeholders submitted four rounds of written comments to the ISO on the following dates:

- Round One: January 8, 2010
- Round Two: February 3, 2010
- Round Three: May 20, 2010
- Round Four: June 25, 2010

This matrix summarizes comments provided on the *Draft Final Proposal*, which were due June 25, 2010.

Stakeholder comments are posted at: <http://www.caiso.com/2488/2488b47711c30.html>

Other stakeholder efforts include:

- Stakeholder Conference Call: December 30, 2009
- Stakeholder Conference Call: January 27, 2010
- Stakeholder Conference Call: May 10, 2010
- Stakeholder Conference Call: June 16, 2010

Management Proposal	CDWR-SWP	Powerex	Six Cities	Southern California Edison	Pacific Gas & Electric	Department of Market Monitoring	Management Response
Three options for generated bids: <ul style="list-style-type: none"> Negotiated Price-taker + GMC LMP-based 	No comment	Supports	Supports	Supports	Supports	Supports	
Unavailability reporting	No comment	Supports Urges SLIC updates	Supports	No comment	No comment	Supports	Unavailability reporting will apply for complete unavailability as well as for partial unavailability of resource adequacy capacity
Separate "bucket" of standard capacity product revenues for NRS-RA resources	No comment	No comment	Supports	No comment	No comment	No comment	
No grandfathering	Does not support Requests grandfathering of certain contracts from standard capacity product provisions	No comment	Supports	No comment	Conditional	No comment	The current policy which remains unchanged with this proposal is that NRS-RA resources do not qualify for grandfathering. The ISO specified in this proposal that NRS-RA resources will have the same availability assessment under standard capacity product as other resources. This is the same standard that is applied today with the exception that now NRS-RA resources can submit outages and are not considered 100% available. Management does not believe a new grandfathering provision as a result of this proposal is warranted.
Substitution with internal non-RA	Does not support Requests that external resources be able to substitute for unavailable resource adequacy resources	No comment	No comment	Conditional	No comment	No comment	External resources cannot substitute for unavailable resource adequacy resources because external resources cannot bid into residual unit commitment which is a key component of providing resource adequacy capacity

Management Proposal	CDWR-SWP	Powerex	Six Cities	Southern California Edison	Pacific Gas & Electric	Department of Market Monitoring	Management Response
Subset-of-hours accommodation for all resource adequacy resources	No comment	Supports	Supports	Supports	No comment	Concerns about adequacy of resource adequacy capacity in off-peak hours Potential increase in interim capacity procurement mechanism (ICPM)	Monitoring will be developed and implemented along with this change Potential impacts on ICPM commitments will be addressed through the ICPM stakeholder initiative
Standard capacity product performance measurement for a resource will not include hours outside its resource adequacy contract	No comment	No comment	No comment	No comment	No comment	Concern that could provide incentive to minimize contracting for availability assessment hours	Monitoring will be developed and implemented along with this change