

Response to Stakeholder Comments on Draft and Revised Draft Tariff Language CCE3 and RSI Clarifications

Tariff Section	Party	Stakeholder Comment	ISO Response
30.4.1.1.6.1	Six Cities	Placement of the phrase “on an annual basis” creates ambiguity. The Six Cities recommend moving the phrase “on an annual basis” from the fourth line of the section to the third line after the word “demonstrate” to make clear that the phrase applies to the registration and validation process rather than the temporal scope of the use limits.	Agree, ISO will revise.
30.4.1.1.6.1.1	PG&E	PG&E requests that CAISO update the effective date of the following language: “Effective November 1, 2021, no contractual limitations will constitute qualifying contractual limitations that satisfy the requirements of this Section.” Three years from the proposed Tariff changes would be April 1, 2022. The resources using this condition should be allowed to use an Opportunity Cost reflecting one year of operations until that time (vs. the resource being modeled to use all of its starts prior to April 1, 2022).	Agree that date needs to be changed.
30.4.1.1.6.1.2	Six Cities	On the twenty-first line of the section, placement of the phrase “on an annual basis” creates ambiguity. The Six Cities recommend moving the phrase “on an annual basis” from the twenty-first line of the section to the twentieth line after the word “demonstrate” to make clear that the phrase applies to the registration and validation process rather than the temporal scope of the use limits.	Agree, ISO will revise.



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30.4.1.1.6.2.1	PG&E	Within the calculation of opportunity cost adders section (p.5), CAISO removed language allowing for opportunity costs to be updated more frequently than a monthly granularity. PG&E feels that this language should remain, given the opportunity costs for some resources could change substantially within a month. Two examples of this are hydro resources and RDRR demand response programs. This lack of updating will be especially concerning when resources are nearing the end of the limitation period. Market participants should have the ability to request a mid-month update.	The ISO has no functionality to update Opportunity Cost Adders mid-month.
40.6.1(1)	PG&E	PG&E is concerned with the implications of the language change from “physically capable of operating” to “not on Outage.” There are certain classes of resources, for example legacy QFs, that do not need to have bids or self-schedules for their full RA capacity. Not all RA resources are subject to bid insertion or obligated to submit bids.	This proposed edit has been reversed in the revised section 40 draft.
40.6.1.1(b)(1)(B)	Six Cities	In the second line, change “physically capable of operating” to “not on Outage” for consistency with other revisions.	ISO is no longer proposing the change so no edit necessary.
40.6.1.1(d)	PG&E	This language makes no reference to exemptions allowed for Use-Limit Reached OMS cards or other OMS cards. CAISO should include these exemptions or reference section 40.9.3.4(d).	This proposed section has been removed as unnecessary.
40.6.2(b)	PG&E	The CAISO states that there is a procedure to waive availability obligations for resources based on a procedure to be published on the CAISO website.	This is existing language moved from section 40.6.3. Such a procedure does not exist today but the ISO is not going



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		PG&E requests that the CAISO provide more clarification on this procedure document.	to foreclose the opportunity to do that in the future.
40.6.2(f)	Six Cities	Why are the proposed revisions to this sub-section different from the proposed revisions to Section 40.6.1.1(a)? Specifically, why is the phrase “that are not Use-Limited Resources” retained in this sub-section but deleted from Section 40.6.1.1(a)?	Agreed. That phrase should be deleted.
40.6.2(g)	Six Cities	Why are the proposed revisions to this sub-section different from the proposed revisions to Section 40.6.1.1(b)(1)? Specifically, why is the phrase “and are not Use-Limited Resources” retained in this sub-section but deleted from Section 40.6.1.1(b)(1)?	Agreed. That phrase should be deleted.
40.6.2(h)	PG&E	This language makes no reference to exemptions allowed for Use-Limit Reached OMS cards or other OMS cards. CAISO should include these exemptions or reference section 40.9.3.4 (d).	This proposed section has been removed as unnecessary.
40.6.4.1	PG&E	The language changes in this section are unclear and beyond the scope of CCE3. It appears that the CAISO is trying to change the definition of a VER. This will have broad implications. There are classes of resources that have no obligation to provide self-schedules or bids up to the RA quantity. A legacy hydro QF is one example of such a resource. Furthermore, this language does not consider lack of physical availability of these resources. The CAISO also appears to be changing the RAAIM calculation. This language should be removed from CCE3.	The revised draft language directly addresses the scope of the RAAIM exemption in 40.9.2(b). The language PG&E viewed as changing the definition of a VER is no longer being proposed.



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40.6.4.1	PG&E	PG&E is unclear as to the intent of the proposed language: "If the only reason a given RA Resource is not required by this Tariff to submit a Bid to either the DAM or RTM is this Section 40.6.4.1, then, notwithstanding any RAAIM exemptions provided in Section 40.9.2, the RA Resource has not met the requirements of Section 40.6 for the purposes of the RAAIM calculations in Section 40.9." PG&E recommends that it be removed.	This will be deleted. No longer necessary.
40.6.4.1	Six Cities	What are the "inherent properties" of a source as distinguished from the capabilities of an individual Generating Unit? Does a solar or wind unit paired with storage capability have multiple sources of energy? – Is it the intent of this language to negate a RAAIM exemption provided for in Section 40.9.2? If that is the case, then Section 40.9.2 should be revised for clarity.	The revised draft language directly addresses the scope of the RAAIM exemption in 40.9.2(b). The language PG&E viewed as changing the definition of a VER is no longer being proposed.
40.6.5.1	Six Cities	Should this section also refer to Medium Start Unit for consistency with previous revisions?	This section has cross-references that needed to be updated. The references to section 40.6.3 and 40.6.7 are no longer relevant.
40.6.8(e)	PG&E	The proposed changes to this section are confusing and difficult to read. PG&E is also unclear as to why certain types of resources are being called out when "generally applicable bidding rules call for bid insertion."	The revised draft language is streamlined with a general reference to the generally applicable bidding rules in section 30.
40.8.1.6	Six Cities	What constitutes backup sources of generation? Is storage capability a backup source of generation? Recognizing that this is existing tariff language,	We are just including this section here to correct a cross-reference. This

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		clarification is important for implementation of the CCE3 initiative.	section is about setting QC so we aren't looking to touch it.
40.9.3.4(d)	PG&E	For clarity, CAISO should expand the term “short-term use limitation” to include the various categories (i.e. Annual, Monthly, Other) found in Section 2.4 of the BPM for Outage Management.	Existing authority permits ISO to maintain this detail in the BPM.
40.9.3.4(d)	Six Cities	In the third line, delete “Forced” for consistency with the revision to the caption of the subsection.	This section is potentially being amended as part of the transmission-induced generation outage RAIM exemption initiative and has been omitted.
40.9.3.4(e)	Six Cities	It is not clear why the provisions of this subsection should apply only in the event of a Forced Outage. The Six Cities request explanation and/or clarification.	This provision is in the heart of RAIM calculation so any changes here are out of scope.
Appendix A – Conditionally-Available Resource	PG&E	CAISO should clarify the intent of the new definition for “Conditionally Available Resource.”	Intent is to capture the universe of resources that are no longer “Use-Limited Resources,” but still have inherent limitations. This is meant to be a catchall category. The intent is not to subject such resources to big generation.
Appendix A – Conditionally-Available Resource	Six Cities	The proposed definition for this term seems unduly vague and open-ended. For example, it would appear that most resources classified as Use-Limited Resources also would satisfy the proposed definition of Conditionally Available Resource. The Six Cities recommend that the ISO attempt to specify what types of limitations will support	Intent is to capture the universe of resources that are no longer “Use-Limited Resources,” but still have inherent limitations. This is meant to be a catchall category. The intent is not to subject such resources to big generation.



California ISO

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Tariff Section	Party	Stakeholder Comment	ISO Response
		classification as a Conditionally Available Resource and how such limitations must be documented.	