

Matrix of Stakeholder Comments and Responses on first posted draft of RSI 1b tariff language

Section	Party	Comment	Response
9.3.1.3.3.4(c)(3)	Six Cities	A sentence here does not appear to be consistent with Section 40.9.3.6.3.	Section 40.9.3.6.3 redrafted to acknowledge that some forced outages will not be subject to RAAIM.
9.3.1.3.4	NRG	It's not clear if the CAISO is replacing this existing section or adding the proposed new language to this section.	There was an error in the header for this section. Existing language is being moved elsewhere and replaced with the proposed language, with is also existing language being relocated.
9.3.1.3.4	NRG	With regards to the proposed new tariff language – the CAISO uses the undefined terms “outage” and “de-rates”. If the CAISO is not going to define or clarify those terms in this language, the tariff should simply convey the obligation to report in accordance with the relevant Business Practice Manual.	This is existing language moved from elsewhere as part of reorganizing the sections.
40.9.3.4(d)	Six Cities	This seems to be inconsistent with Section 40.9.3.6.3.	Section 40.9.3.6.3 redrafted to acknowledge that some forced outages will not be subject to RAAIM.
40.9.3.6.10 (a)	NRG	Does “due dates” include the dates by which the CAISO is obligated to take action or provide notification? If not, it should.	Existing tariff language moved from elsewhere. The posted calendar includes ISO action dates ( <a href="https://www.caiso.com/Documents/2016MonthlyResourceAdequacyPlanDueDates.pdf">https://www.caiso.com/Documents/2016MonthlyResourceAdequacyPlanDueDates.pdf</a> )
40.9.3.6.10 (c)	NRG	A nit – the last sentence might better read “Use of the bulletin board is voluntary and for informational purposes only.”	Existing tariff language moved from elsewhere.
40.9.3.6.2	NRG	A consistency nit – the number “8” is spelled out in other tariff sections (e.g., the first sentence of Section 40.9.3.6.3) but not in the last sentence of this section.	Agreed.
40.9.3.6.3	NRG	The second sentence of the last paragraph added is this section says “Any such outage, irrespective of whether the resource is providing RA Capacity or Flexible RA Capacity, automatically shall be considered to hold a substitution assignment.” By “hold a substitution assignment” – does the CAISO mean “require the provision of RA Substitute Capacity”? If not – what does the phrase “hold a substitution assignment” mean?	That sentence has been redrafted.

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40.9.3.6.4	Six Cities	Is it necessary to make specific reference here to “Forced Outage, Maintenance Outage or de-rate”? In other places (e.g., Section 40.9.3.6.5(a)) there are simply references to resources “on outage” which seems more straightforward.	Changed Section 40.9.3.6.5(a) to make usage consistent.
40.9.3.6.4 (c)	NRG	The CAISO should use the defined term “Forced Outage” or, if needed, create a new defined term that clearly identifies what the undefined term “forced outage” means in this section.	Agreed.
40.9.3.6.5	Six Cities	See the comment above re whether it is necessary to make specific reference here to “Forced Outage, Maintenance Outage or de-rate.”	Language has been redrafted to use more general defined term "Outage."
40.9.3.6.6	Six Cities	See the comment above re whether it is necessary to make specific reference here to “Forced Outage, Maintenance Outage or de-rate.”	Language has been redrafted to use more general defined term "Outage."
40.9.3.6.6(e)(1)	Six Cities	Since Pseudo-Tie resources and Dynamic Scheduled System Resources are eligible to provide Flexible RA under Section 40.10.3.6, why shouldn’t they be able to provide RA Substitute Capacity for a Flexible RA resource on outage?	This is existing tariff language.
40.9.3.6.7	Six Cities	See the comment above re whether it is necessary to make specific reference here to “Forced Outage, Maintenance Outage or de-rate.”	Language has been redrafted to use more general defined term "Outage."
40.9.4(a)(4)	Six Cities	This now duplicates sub-section (2).	Agreed.
40.10.2.3	Six Cities	Capitalize "Flexible" RA requirement	"Flexible RA Capacity" is a defined term but "flexible RA" is not.
40.10.5.2(a)	Six Cities	Should the year be changed to 2016 or the “except” clause deleted?	Leave as it is for now. Deleting the clause would be a reasonable clean-up item but it is still recent enough that it’s relevant to keep in tariff for now.
43A.2.3	Six Cities	provide --> provided	Agreed.
43A.2.3	Six Cities	applicable --> annual	Agreed.
Appendix A -- RA Maintenance Outage With Substitute	NRG	RA Maintenance Outage With Substitute – “Substitute” should be “Substitution.” Same thing for RA Maintenance Outage Without Substitute.	Agreed.

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Appendix A -- RA Substitute Capacity	Six Cities	See the comment above re whether it is necessary to make specific reference here to “Forced Outage, Maintenance Outage or de-rate.”	Language has been redrafted to use more general defined term "Outage."
Appendix A -- RA Substitute Capacity	Six Cities	If specific references are made, in previous sections the reference has been to “Maintenance Outage” rather than “Approved Maintenance Outage”.	"Approved Maintenance Outage" is helpful terminology to be clear that an unapproved Maintenance Outage would become a Forced Outage and that providing substitute capacity for a Maintenance Outage that is not ultimately approved is not necessarily the same as providing substitute capacity for a Forced Outage.