

- 1) Certify that the control area in which the external resource is located will not recall or curtail, for purposes of satisfying its own control area load, imports from that control area into the CA ISO control area of an amount of energy equal to the capacity that the external resource is supplying to the CA ISO control area;
- 2) Certify that the control area in which the external resource is located will afford the CA ISO control area the same curtailment priority that it affords its own control area load;
- 3) Identify the delivery point to the CA ISO system;
- 4) Verify that it has made all arrangements required by the appropriate control area to ensure that the energy associated with the external resource's sale to the CA ISO control area will be delivered to the CA ISO control area. For example, a utility relying on an external resources located in Bonneville Power Administration's (Bonneville) Control Area must demonstrate that it has acquired firm transmission service from Bonneville from the point(s) of injection on the Bonneville system to the point of delivery identified in (3) above;
- ~~5) Verify that it has acquired CRRs from the point of delivery identified in (3) above (source) to the load it is supplying (sink);~~
- 6) 5) The nature of the underlying source of the power; and
- 7) 6) The means of contractual control.

b. Demand Response Resources

The CA ISO recommends that the utilities be allowed to use demand response programs to meet their monthly reliability obligation, provided that the programs meet adequate standards⁴. The principal issue regarding the use of demand response programs to meet the monthly

⁴ The testimony of Mary Jo Thomas discusses how energy efficiency and demand response programs can otherwise be considered in the context of the utility long-term procurement plan and the requirements for demand response to be used as operating reserves.