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Comments on the Proposed Eligible Intermittent Resource Tariff Modifications

NextEra Energy Resources, LLC. wishes to thank the CAISO for its efforts in gathering stakeholder inputs into the proposed tariff modifications. At various stages in the stakeholder process, NextEra has submitted comments on the principles posed in the modifications.

NextEra's major remaining concern relates to the 1MW derate threshold for generators greater than 10MW noted in section 9.3.10.3 and section 9.3.10.3.1. As NextEra has stated in the past, this threshold equates to the loss of a single turbine in most modern wind farms. When the threshold is considered, for example, in the context of operating multiple 50 MW - 150 MW sites or greater, the opportunity and likelihood of qualifying derates and the corresponding resources required to report changes becomes significant.

NextEra appreciates CAISO's efforts to assuage this concern with the promise of automation able to retrieve the needed data and granularity. However, the current automation offered requires significant manual intervention as opposed to a truly automated solution whereby CAISO could retrieve, for example, real-time data from scada or telemetry. If one looks to many other industries the problem of collecting and consolidating key data from disparate sources has been overcome by leveraging standard data sharing conventions (i.e. Banking: ACH/EDI/XML). CAISO should be looking to reach similar automation not only to achieve the goal set forth in this tariff revision but to set the platform for any future data that might be of interest to reliability while minimizing the impact on participants. Moreover, the promise of automation is used to suggest that the 1MW threshold is plausible yet, as set forth in this draft tariff, the requirement to comply is not contingent on CAISO making adequate automation and facilities available to make the requirements achievable. Instead, it remains silent inferring that the burden is entirely borne by EIRPs irrespective of automation being present or not.

NextEra believes CAISO needs to explore and implement the "right" solution: one that is scalable and poises CAISO well for accommodating any future data needs while making compliance reasonably efficient and achievable for participants. In the context of CAISO's goal to achieve 33% RPS, it is imperative that standards, systems, and processes put in place now be sensitive to the needs of the future. The draft tariff language and solutions supporting it fall short of this. In the absence of this focus the 1 MW threshold is a continued concern.

Sincerely,

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