**Pseudo-Ties of Shared Resources**

**Response to Stakeholder Comments on Revised Draft Tariff Language and**

**Explanation of Additional Revisions since September 1, 2020 Stakeholder Meeting**

| **Tariff Section(s)** | **Stakeholder Comment** | **CAISO Response** |
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| 2.2.1.2 | SCE requested confirmation that the requirement that the entire output of a generating pseudo-tied out of the CAISO balancing authority area in section 2.2.1.2 was not in conflict with the proposed changes to section 1.2.1.2 with respect to pseudo-ties into the CAISO balancing authority area.  | The CAISO confirms that this difference between parallel provisions, one applicable to pseudo-ties to the CAISO balancing authority area and the other applicable to pseudo-ties out of the CAISO balancing authority area, is intentional. As noted in footnote 9 on page 7 of the final proposal, there would be a range of issues in considering splitting of resources within the CAISO BAA, which could not be considered in this initiative, and states that these issues can be considered in the future, broader phase of the JOU initiative. Accordingly, no changes to section 2.2.1.2 will be made as part of this initiative.  |
| 3.2.1 | Six Cities requested reinstatement of the reference to Pseudo-Tie Generating Units to clarify that the allocation protocol would not apply to a share of a resource that may continue to participate in the CAISO markets as a system resource.  | The CAISO has reinstated this reference. There is no intention for the allocation protocol to apply to a share of a resource that may continue to participate in the CAISO markets as a system resource. |
| 3.2.43.2.5 | Six Cities requested clarification that a share of a resource could continue participation in the CAISO markets during suspension and following termination. Six Cities also requested clarification that each share could determine whether to participate as a pseudo-tie or a system resource, and could change its election provided it met the requirements associated with each mode of participation.  | The CAISO has clarified sections 3.2.4 and 3.2.5 and made a general statement in section 3.1.1 to clarify the option of a resource share to elect either mode of participation. In addition, the CAISO has corrected a typographical error in section 3.2.5 as noted by SCE.  |