

## Stakeholder Process for Generator Outage and Availability Reporting Tariff Filing

### Summary of Written Comments

ISSUE IDENTIFIED	CAISO PROPOSAL	COMMENTS
30-Minute Reporting Timeline	CAISO proposes to increase from 30 to 60 minutes the maximum permissible amount of time to submit an Availability Report	<b>SCE:</b> Supportive
		<b>PG&amp;E:</b> Supportive.
		<b>CORAL:</b> Supportive
		<b>NCPA:</b> Supportive
		<b>Reliant:</b> Supportive idea of additional time to report
Late Reporting Permissibility	CAISO proposes to increase from <i>one-per-year</i> <sup>1</sup> to <i>one-per-month</i> <sup>2</sup> the number of permissible late reports before triggering DMM investigation	<b>SCE:</b> Supportive. Also recommended DMM actions for subsequent late reports (in a calendar month). For the second late report, CAISO issues a written warning. For the third late report and any subsequent, monetary penalties kicks in.
		<b>PG&amp;E:</b> Supportive
		<b>CORAL:</b> Supportive
		<b>Reliant:</b> Supportive

<sup>1</sup> Per Resource ID

<sup>2</sup> *ibid*

ISSUE IDENTIFIED	CAISO PROPOSAL	COMMENTS
Late Report Deadline	To qualify for the permissible late report, availability report must be received within two hours.	<b>SCE:</b> Does not support. Willing to support a discovery based reporting requirement.
		<b>PG&amp;E:</b> Does not support. Requests elimination of this requirement.
		<b>CORAL:</b> Does not support. Requests elimination of this requirement.
Reporting Threshold (MW)	No proposed changes. CAISO recommends retaining the current MW reporting threshold requirements (i.e. 10 MW Availability Reporting criteria for derated units and 40 MW requirements for units that go off-line)	<b>SCE:</b> SCE Supportive.
		<b>Reliant:</b> Does not see any benefit to a change.
DMM Reports to MPs		<b>SCE:</b> SCE requests CAISO DMM publish a monthly outage activity report.
		<b>PG&amp;E:</b> PG&E requests that CAISO DMM consider changing from a bi-weekly report to a monthly report and include all on-time and late outage reporting.
Retroactive Application	No proposed changes.	<b>CORAL:</b> Encourages application of the proposed new requirements back to the date when penalties when into effect on (July 1, 2007).
Elimination of the two week Pmin and Pmax outage card limits	No proposed changes	NCPA