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Brookfield Renewable Energy Group ("Brookfield") Comments on the Proposed Removal of East Kern River Wind Resource Area from ISO Control

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Through a market notice sent on September 13, 2013, the CAISO announced its intention to release the East of Kern River Resource Area (EKWRA) facilities from ISO control and invited market participants to submit comments by October 29, 2013. Brookfield has several wind facilities that will be affected by the change and therefore, as further outlined in the list of questions below; we are requesting more information specific to impacts to existing agreements and outage coordination.

Impacts to existing agreements:

- a. Will the LGIA be amended or replaced with a 2-party Wholesale Distribution Access Tariff (WDAT)?
- b. If a WDAT is required what will be the costs and timing for conversion?
 - i. What change if any would there be to current services charges?
 - ii. If agreement language is to be modified when would SCE and/or CAISO provide draft documents?
- c. Will the existing EKWRA charge be eliminated as a result of new retail load connecting to Windhub?
- 2) Outages:
 - a. What is the timeline and duration for outages?
 - b. What coordination will there be with existing wind facilities to minimize impacts related to outages?

Brookfield appreciates the opportunity to submit these comments. Thank you for your consideration.