

## CDWR comments on Draft NRS-RA MOO & Bid Generation Tariff Clarifications

August 26, 2019

CDWR respectfully submits following comments on the DRAFT NRS-RA MOO & Bid Generation Tariff Clarification language:

- 1) CDWR understands the proposed language for the section 40.6.8 (f) to indicate that an NRS-RA resource that has an award in the IFM currently is and will not in future be subject to economic bid generation in the RTM if no bid for IFM award is submitted in the RTM. Instead, a self-schedule will be inserted only for the amount of IFM award received. Will the insertion of self-schedule in the RTM for IFM award (provided missing bid in RTM for IFM award) make the resource 100% available in the RTM for RAAIM assessment as the insertion is limited to the IFM award? If NRS-RA resource must offer full capacity in RTM even if the IFM award was less than the RA capacity, then such requirement and resulting RAAIM assessment should be clearly stated.
- 2) Some of the proposed changes in the language under the section 40.6.2 (a) and (b) may have impact on other resources (not NRS-RA imports) including short start units such as hydro resources. Currently use-limited resources such as hydro resources are exempt from RUC must-offer requirement. Can the CAISO confirm that the proposed changes will not have any impact on the existing RUC must-offer exemption to such resources?
- 3) The tariff section 40.6.4.3 sets requirements for a participating load providing RA capacity. Any implementation on the changes driven by the above- proposed language should not impact a participating load providing RA under the section 40.6.4.3 in terms of its specific must offer requirement. Can CAISO confirm that the proposed language will not have such impacts?

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