

DC Energy Comments on Temporary Shutdown of Resource Operations Straw Proposal

Submitted by	Company	Date Submitted
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DC Energy appreciates the opportunity to provide comments on the California Independent System Operator (CAISO) Temporary Shutdown of Resource Operations Straw Proposal. On the June 28th stakeholder call we inquired whether the requests to shutdown and subsequent determinations would be noticed to the market. We were informed the requests would be processed through the Outage Management System, however it was not clear if they would be made transparent to the market. DC Energy submits that in order to uphold market transparency the following elements of the straw proposal should be noticed to the market within five business days of the submitted request or determination:

- (i) Requests for temporary shutdown or requests to renew a temporary shutdown
- (ii) CAISO's determination (i.e. rejection or approval) of said request
- (iii) CAISO initiated recalls of a resource that is currently in a temporary shutdown
- (iv) Early return to service from a currently scheduled temporary shutdown

Providing market notices for these items within five business days is the current practice for the comparable processes in the Electric Reliability Council of Texas (ERCOT). The notices contain the resources name, the requested action or determination, and the associated start and end dates. This practice has functioned well in the ERCOT market for numerous years and would close any information asymmetry in the straw proposal. In addition, it would provide valuable information to transmission planners seeking to understand resource availability and its impact on system needs. We appreciate the CAISO's consideration of our comments.