

**Stakeholder Process: Renewable Integration – Market & Product Review Phase 1**

## Summary of Submitted Comments

**Stakeholders submitted nine rounds of written comments to the ISO on the following dates:**

- Round One, 07/30/10 (Comments on discussion paper)
- Round Two, 10/19/10 (Comments on issue paper)
- Round Three, 01/21/11
- Round Four, 03/11/11
- Round Five, 05/11/11
- Round Six, 07/28/11
- Round Seven, 09/07/11
- Round Eight, 10/14/11
- Round Nine, 11/18/11

**Stakeholder comments are posted at:**

<http://www.caiso.com/Documents/Renewable%20integration%20market%20and%20product%20review%20phase%201%20-%20stakeholder%20comments>

**Other stakeholder efforts include:**

- Stakeholder meeting – 07/16/10
- Stakeholder meeting – 10/05/10
- Market Surveillance Committee meeting – 11/19/10
- Stakeholder meeting – 01/06/10
- Stakeholder meeting - 02/24/11
- Stakeholder conference call – 03/21/2011
- Stakeholder conference call – 05/03/11
- Stakeholder meeting – 07/19/11



- Stakeholder meeting – 08/29/11
- Stakeholder conference call – 09/01/11
- Market Surveillance Committee meeting – 09/30/11
- Stakeholder conference call - 10/05/11
- Stakeholder conference call – 11/08/11
- Stakeholder conference call – 11/16/11
- Market Surveillance Committee meeting - 12/08/11

Management Proposal	PIRP Revisions	Energy Bid Floor	Bid Cost Recovery	Management Response
Brookfield	Oppose Does not support cost allocation revisions.	Supports	No Comment	<p><u>PIRP Revisions:</u> Management is not seeking approval of proposed PIRP revisions in the draft final proposal, but rather will continue to seek to address outstanding stakeholder concerns.</p> <p><u>Energy Bid Floor:</u> Rather than automatically lowering the energy bid floor from -\$150/MWh to -\$300/MWh after one year, Management recommends evaluation of market data after one year with the bid floor at -\$150/MWh.</p> <p><u>Bid Cost Recovery:</u> Management recommends seeking approval of the BCR mitigation measures after a follow-on stakeholder process through which those complex topics can be further vetted and refined.</p>
Calpine	No Comment	Conditional Supports lowering the bid floor but prefers a more conservative value. Recommends review of market data prior to subsequent step-down of the bid floor.	Conditional Supports separation of netting but has significant concerns about the BCR mitigation measures.	
CDWR-SWP	Supports	Supports Recommends review of market data prior to subsequent step-down of the bid floor.	Supports Recommends extensive testing and calibration. Had clarifying questions about the BCR mitigation measures.	
CalWEA	Opposes Does not support cost allocation revisions.	Supports	Supports	
Duke Energy	Conditional Supports most elements, but expresses concerns about cost allocation.	No Comment	No Comment	
Iberdrola	Opposes Does not support	No Comment	No Comment	

Management Proposal	PIRP Revisions	Energy Bid Floor	Bid Cost Recovery	Management Response
	cost allocation revisions.			
NRG	Opposes  Does not support cost allocation revisions.	No Comment  Comments on previous iterations of the proposal were not supportive.	Conditional  Does not support the proposed BCR mitigation measures.	
PG&E	Opposes  Recommends elimination of the PIRP program.	Conditional  Recommends review of market data prior to subsequent step-down of the bid floor.	Conditional  Supports separation of netting but has significant concerns about the BCR mitigation measures.	
Powerex	Supports	Conditional  States that the proposal is a good first step, strongly supports symmetrical energy bid cap and floor.	No Comment	
SDG&E	Opposes  Prefer the elimination of the PIRP program, but states that cost allocation revisions are a good first step.	Conditional  States that the proposal is a good first step in lowering the energy bid floor.	Supports	
Six Cities	Conditional  Supports cost allocation revisions but does not support retaining the PIRP program indefinitely.	Conditional  Supports lowering the bid floor but prefers a more conservative value. Recommends review of market data prior to subsequent step-	Supports  Recommends refinements to the BCR mitigation measures.	

Management Proposal	PIRP Revisions	Energy Bid Floor	Bid Cost Recovery	Management Response
		down of the bid floor.		
SMUD	Opposes  Does not support cost allocation revisions.	Opposes  States need for additional flexibility for PIRP bidding and scheduling.	No Comment	
SCE	Conditional  Prefers the elimination of the PIRP program, but states that cost allocation revisions are a good first step.	Conditional  Recommends review of market data prior to subsequent step-down of the bid floor.	Conditional  Supports separation of netting but has significant concerns about the BCR mitigation measures.  Recommends additional time for stakeholder process.  Recommends refinements to the BCR mitigation measures.	
WPTF	No Comment  Recommends additional time for stakeholder process.	No Comment	No Comment  Recommends additional time for stakeholder process.	