

# Comments on the Reliability Services Initiative Phase 1B and 2 – Second Revised Draft Tariff Language

## Department of Market Monitoring July 14, 2017

The California ISO Department of Market Monitoring (DMM) appreciates the opportunity to comment on the ISO's Reliability Services Initiative Phase 1B and 2 – Second Revised Draft Tariff Language.<sup>1</sup>

DMM would like to reiterate its previously filed comments on the revised draft tariff language.<sup>2</sup>

Further, in section 40.7 (a) the ISO proposes the following language:

If the CAISO identifies an insufficiency through Phase 2 of the Local Capacity Area Resource sufficiency evaluation, then the CAISO may notify the relevant Local Regulatory Authority of the insufficiency but may take no other adverse action towards the insufficient Load Serving Entity.

The clause "but may take no other adverse action towards the insufficient Load Serving Entity" appears to be overly broad and unnecessary.

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<sup>1</sup> *Reliability Services Initiative Phase 1B and 2 – Revised Draft Tariff Language*, July 7, 2017:  
<http://www.caiso.com/Documents/SecondRevisedDraftTariffLanguage-ReliabilityServicesPhase1B-Phase2.docx>.

<sup>2</sup> Available at: [http://www.caiso.com/Documents/DMMComments-ReliabilityServicesPhase1B\\_Phase2-RevisedDraftTariffLanguage.pdf](http://www.caiso.com/Documents/DMMComments-ReliabilityServicesPhase1B_Phase2-RevisedDraftTariffLanguage.pdf).