

# Stakeholder Comments

## Transmission Induced Generator Outages Call December 12, 2018

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NCPA supports the ISO’s review and intent to grant a RAAIM waiver to generators that are subject to unavailability caused by planned transmission outages. Since a transmission induced outage is beyond a resource’s control, NCPA agrees that the RAAIM exemption should apply regardless of whether the transmission outage is planned or forced and scheduling coordinators should not be obligated to provide replacement capacity. NCPA notes the new proposed tariff language should not only apply to local and system RA, but also include flexible RA capacity resources.