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Sent: Friday, January 22, 2016 9:20 AM
To: CAISO Tariff <MRTUtariff@caiso.com>
Subject: NRG Energy, Inc. Comments on RSI Phase 1B Tariff language

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Section	Comment
40.9.1.3.4	It's not clear if the CAISO is replacing this existing section or adding the proposed new language to this section. With regards to the proposed new tariff language – the CAISO uses the undefined terms “outage” and “de-rates”. If the CAISO is not going to define or clarify those terms in this language, the tariff should simply convey the obligation to report in accordance with the relevant Business Practice Manual.
40.4.7.1 (c)	NRG recently provided the CAISO with a letter noting its concerns about the RA Plan and Supply Plan validation processes. Given that the CAISO is moving the deadline for making any changes to Supply Plans from 10 to 30 days before the month, NRG urges the CAISO to address those concerns before implementing this new tariff language.
40.9.3.6.2	A consistency nit – the number “8” is spelled out in other tariff sections (e.g., the first sentence of Section 40.9.3.6.3) but not in the last sentence of this section.
40.9.3.6.3	The second sentence of the last paragraph added in this section says “Any such outage, irrespective of whether the resource is providing RA Capacity or Flexible RA Capacity, automatically shall be considered to hold a substitution assignment.” By “hold a substitution assignment” – does the CAISO mean “require the provision of RA Substitute Capacity”? If not – what does the phrase “hold a substitution assignment” mean?
40.9.3.6.4 (c)	The CAISO should use the defined term “Forced Outage” or, if needed, create a new defined term that clearly identifies what the undefined term “forced outage” means in this section.
40.9.3.6.10 (a)	Does “due dates” include the dates by which the CAISO is obligated to take action or provide notification? If not, it should.
40.9.3.6.10 (c)	A nit – the last sentence might better read “Use of the bulletin board is voluntary and for informational purposes only.”
Definitions	RA Maintenance Outage With Substitute – “Substitute” should be “Substitution” Same thing for RA Maintenance Outage Without Substitute.



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