

Powerex is pleased to be able to provide the attached suggested edits (highlighted in yellow) to Section 9.3.10.6.1:

“The SC for Non-Resource Specific System Resources that provide Resource Adequacy Capacity shall report to the CAISO through the outage management system any Forced Outage of a Generating Unit or Forced Outage or Constraint of transmission facilities external to the CAISO Balancing Authority Area that directly results in the inability of the resource to deliver all or a portion of the Resource Adequacy Capacity identified in the resource’s Supply Plan to the CAISO Balancing Authority Area. The SC for Non-Resource Specific System Resources that provide Resource Adequacy Capacity are required to provide to the CAISO notice of the Forced Outage or Constraint within sixty (60) minutes after becoming aware of the circumstance and an explanation of the Forced Outage or Constraint within two (2) Business Days after providing the notice. The explanation shall include the following: a description of the Forced Outage affecting the Generating Unit intended to be the source of the Resource Adequacy Capacity and the estimated return time of the unit; a description of the Forced Outage or Constraint of transmission facilities external to the CAISO Balancing Area Authority; and the impact of such circumstance on the resource’s ability to deliver Resource Adequacy Capacity to the CAISO Balancing Authority Area. Upon request of the CAISO, The SC for a Non-Resource Specific System Resource that provides Resource Adequacy Capacity shall promptly respond to a request by the CAISO to provide additional information to enable the CAISO to review the Forced Outage or Constraint and its impact on the ability of the resource to deliver Resource Adequacy Capacity to the CAISO Balancing Authority Area. If the CAISO determines that any Forced Outage or Constraint may have been the result of gaming or other questionable behavior, the CAISO shall submit a report describing the basis for its determination to the FERC and notify the SC.”

If you have any questions, please let me know.

Thanks.

Gifford Jung

Powerex, Trade Policy