

Stakeholder Comments Template

Subject: Generated Bids and Outage Reporting for Non-Resource Specific RA Resources

Submitted by	Company	Date Submitted
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This template has been created for submission of stakeholder comments on the following topics covered in the *Issue Paper* regarding the process for generated bids and outage reporting for non-resource specific system resources with Resource Adequacy contracts. The *Issue Paper* was posted on December 18, 2009 and a conference call to discuss the paper and answer questions was held on December 30, 2009. Upon completion of this comments template please submit it to GBiedler@caiso.com. Submissions are requested by close of business on January 8, 2009.

Please submit your comments to the following questions for each topic in the spaces indicated.

- 1. The ISO has identified three potential methodologies for calculating generated bids for NRS-RA resources. They include a price-taker option, the LMP-based option, and a negotiated option. Please comment on your preferences or concerns with respect to these options.**

SDG&E prefers the negotiated option

- 2. Please provide any suggestions you have regarding what information should be used to inform the development of a negotiated bid for non-resource specific system resources.**

SDG&E believes that each NRS-SR should have a different negotiated bid based on but not limited to cost basis, market prices, fuel prices and system conditions. Each NRS-SR may have a master file similar to that of a system resource. This master file may contain some if not all of the above inputs that will be submitted month ahead along with the month ahead RA supply plan.

- 3. In keeping with the aim of treating NRS-RA resources as similarly as possible to resource-specific RA resources, the ISO proposes the adaptation of the forced**

outage reporting requirements for resource-specific resources. Please provide your comments on the proposed adaptation provided in the December 18th *Issue Paper*.

SDG&E agrees that NRS-SR should report forced outages. However, SDG&E believes that suppliers should not bear the burden to show deliverability; rather the lack of a generation SLIC should be sufficient. SDG&E agrees that a manual process needs to be in place due to the current limitations of SIBR. A possible simplification for settlements could be to include available capacity for each resource (based on SLIC) for each applicable hour on the settlement statement. The CAISO must also include unit substitutions for NRS-SR forced outages in RAAM as those outages need to be excluded. The CAISO should develop a timeline to upgrade SIBR to incorporate new RA must offer obligation and connect with SLIC and RAAM tools. This is so that all parties involved should only have to manually do this for a short period of time.