

April 15, 2025

**Stakeholder Comment: Ancillary Services Focus Group 1**

**Comments on Behalf of the Cities of Anaheim, Azusa, Banning  
Colton, Pasadena, and Riverside, California (“Six Cities”)**

The Six Cities generally support the CAISO’s efforts to ensure testing of 100% of its resources certified to provide Ancillary Services (“AS”) within such time frames as are reasonable under all the circumstances, as required by the tariff, and appreciate the opportunity to comment on the CAISO’s proposal to evaluate alternative ways for AS resources to document their certified AS amounts. In particular, the CAISO is proposing to implement a new requirement that, upon notification from the CAISO, scheduling coordinators will be required to self-attest for their resources’ ability to provide AS services within sixty days of the request.

The Six Cities share the concern raised by stakeholders during the Focus Group meeting on March 31, 2025, with respect to holding scheduling coordinators responsible for attesting to information and performance verification data that should be the responsibility of individual participating generators and/or generator owners. Scheduling coordinators’ ability to comply with the CAISO’s attestation directive as contemplated in the current proposal would depend on the timely submittal of complete and accurate data required to satisfy the proposed attestation criteria from the individual participating generator and/or generator owner to the scheduling coordinator. Moreover, in circumstances where the scheduling coordinator is a third party and not itself the generator owner, it may have no control over whether the participating generator submits accurate information—or any information at all. Accordingly, the Six Cities agree with comments that the CAISO’s proposed solution should focus on the entity that is directly responsible for providing the information and performance verification data the CAISO seeks, rather than the scheduling coordinator.

In addition, the Six Cities believe that additional information and clarification from the CAISO would be helpful in evaluating the current proposal, including, *e.g.*, what procedures, if any, would apply in instances where the participating generator does not submit timely or accurate data to the scheduling coordinator for purposes of providing the attestation to CAISO. The Six Cities also request clarification regarding the potential addition of this new process to the CAISO’s existing processes for AS certification and performance verification, including, *e.g.*, whether the self-attestation requirement may be used to reduce the frequency of AS testing and/or lengthen the intervals between performance audits on a going-forward basis.

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