

March 2, 2017

**COMMENTS ON BEHALF OF THE CITIES OF ANAHEIM, AZUSA, BANNING,
COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA ON THE PARTICIPATING
INTERMITTENT RESOURCE PROGRAM (PIRP) PROTECTIVE MEASURES**

In response to the ISO's request, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the "Six Cities") submit the following comments on the ISO's Participating Intermittent Resource Program ("PIRP") Protective Measures Presentation and Discussion. The ISO has requested comments on the following questions: (1) whether PIRP protective measures should be extended; (2) if extended, what criteria should be met by the resources; and (3) if extended, what should be the duration of the protective measure.

The Six Cities continue to question the need for protective measures for intermittent resources. The 15-minute market structure provides scheduling flexibility to intermittent resources. Therefore, the Six Cities' preference would be to not extend the PIRP protective measures beyond the three-year transition period initially adopted.

The Six Cities' understanding is that there are very few resources currently receiving PIRP protective measures. Extending the protective measures for a limited period of time to these PIRP resources may be justifiable if they still are able to demonstrate that they are subject to circumstances that continue to require a transition mechanism. The Six Cities do not support extending PIRP protective measures for an indefinite period of time, and the protective measures should apply only to resources that meet specified criteria.

Submitted by,

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