

October 3, 2017

**COMMENTS OF THE CITIES OF ANAHEIM, AZUSA, BANNING, COLTON,
PASADENA, AND RIVERSIDE, CALIFORNIA ON CAISO'S RESOURCE ADEQUACY
AVAILABILITY INCENTIVE MECHANISM MODIFICATION
DRAFT FINAL PROPOSAL**

In response to CAISO's request, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the "Six Cities") provide the following comments on the September 21, 2017 Resource Adequacy Availability Incentive Mechanism Modification: Draft Final Proposal ("the Draft Final Proposal"):

The Six Cities continue to support the objectives underlying the modifications to the RAAIM methodology proposed by CAISO. In addition, as of this time, the Six Cities have not identified any issues with CAISO's calculation spreadsheet. During the September 28, 2017 stakeholder web conference, however, representatives of PG&E and SDG&E raised questions concerning some of the sample calculations. Given the complexity of the calculations, the Six Cities urge CAISO to continue to monitor the outcomes produced by the modified methodology and to remain open to further revisions if necessary based on experience as the design changes are implemented.

Submitted by,

Bonnie S. Blair
Thompson Coburn LLP
1909 K Street N.W., Suite 600
Washington, D.C. 20006-1167
bblair@thompsoncoburn.com
202-585-6900

Attorney for the Cities of Anaheim, Azusa,
Banning, Colton, Pasadena, and Riverside,
California