

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your written comments on the stakeholder initiative “Temporary Shutdown of Resource Operations.”

Submit comments to InitiativeComments@CAISO.com

Comments are due July 13, 2017 by 5:00pm

The Straw Proposal posted on June 21, 2017 and the presentations discussed during the June 28, 2017 stakeholder conference call can be found on the [TSRO Website](#).

Please use this template to provide your written comments on the straw proposal topics listed below and any additional comments that you wish to provide.

1. Who is eligible?

Six Cities’ Comments:

A resource should not be eligible to request permission to implement a temporary shutdown for any period during which it is subject to: (i) an RA contract (except where the RA contract expressly contemplates and allows temporary shutdowns and the requested shutdown period does not include any month for which the resource already has been included in an RA showing), (ii) any form of CPM designation, or (iii) a Reliability Must Run (“RMR”) designation. However, a resource that currently is subject to an RA contract, a CPM designation, or an RMR

designation should be able to submit a request for permission to implement a temporary shutdown for a future period for which it does not have RA, CPM, or RMR obligations.

2. Whether the CAISO may allow a Participating Generator to temporarily shut down operation of its Generating Unit for economic reasons.

Six Cities' Comments:

The Six Cities support the CAISO's proposal to allow a Participating Generator to temporarily shut down operation of its Generating Unit for economic reasons, provided there is no adverse reliability impact as determined by the CAISO's study.

3. The conditions under which the CAISO may grant a request for temporary shutdown.

Six Cities' Comments:

The Six Cities support the CAISO's proposal to allow temporary shutdown of resource operations when the CAISO's study in response to a request for permission to implement a temporary shutdown indicates that the requested shutdown will not have adverse impacts on grid reliability.

4. Reliability Studies.

Six Cities' Comments:

The Six Cities generally support the CAISO's approach to evaluation of potential reliability impacts of a requested shutdown as described at pages 17-18 of the Straw Proposal.

5. The form of compensation, if any, that the CAISO would provide the Participating Generator if the CAISO denies the Participating Generator's request to take the Generating Unit out of service for a temporary shutdown.

Six Cities' Comments:

The Six Cities support the CAISO's proposal to pay compensation based on 1/12 of the resource's CPM competitive solicitation process bid price or 1/12 of the CPM soft cap charge per MW for any month during which it denies a resource's request for permission to implement a temporary shutdown based on reliability needs.

6. The CAISO may want to establish a limit on the minimum amount of time that a Generating Unit can shut down its operations, and perhaps a maximum amount of time.

Six Cities' Comments:

The Six Cities support the CAISO's proposals to establish a two-month minimum period and four-month maximum period for temporary shutdowns and to allow renewals of temporary shutdowns. However, a resource that submits requests for sequential temporary shutdown periods should not be permitted to retain full deliverability status beyond one year (*i.e.*, three sequential four-month shutdown periods) unless repowering criteria and procedures are applicable and satisfied.

7. The CAISO will need to establish a specific timeline for requesting shutdown of operations allowing for appropriate operations planning time and notification of approval and denial.

Six Cities' Comments:

Except as addressed elsewhere in these comments, the Six Cities take no position at this time on the CAISO's proposed timeline regarding requests for temporary shutdown of operations.

8. Is there a level of "return-ability" that would need to be maintained while the Generating Unit is in shutdown status?

Six Cities' Comments:

The Six Cities take no position at this time on the CAISO's proposal to require a resource granted permission to implement a temporary shutdown to maintain ability to resume operation within ten business days.

9. If a Participating Generator has temporarily shut down operations of its Generating Unit, would it be eligible to be used as a RA resource in a RA showing for that period?

Six Cities' Comments:

The Six Cities agree with the CAISO's conclusion that a resource should not be eligible to be included in an RA showing for any period during which it has implemented a temporary shutdown. However, the Cities recommend that the CAISO clarify that a resource may terminate a temporary shutdown early and return to operation in order to provide RA capacity.

10. If a Generating Unit has shut down operations in one BAA and is now operating in an adjacent BAA, would it be eligible to be counted as a RA resource in the BAA for which it has shut down its operations?

Six Cities' Comments:

If a resource has shut down operations in the CAISO BAA but is operating in an adjacent BAA, it should be eligible to provide RA capacity in the CAISO BAA only if it is not committed as RA capacity in the adjacent BAA and only if it qualifies under the CAISO requirements applicable to imported RA resources.

11. Other Comments

Please provide any additional comments not associated with the topics listed above.

Comments:

The Six Cities have no additional comments on the Straw Proposal at this time.