

July 8, 2014

**COMMENTS ON BEHALF OF THE CITIES OF ANAHEIM, AZUSA, BANNING, COLTON,  
PASADENA, AND RIVERSIDE, CALIFORNIA ON THE REVISED DRAFT TARIFF  
LANGUAGE FOR FLEXIBLE RESOURCE ADEQUACY  
CRITERIA MUST OFFER OBLIGATION**

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 revised draft tariff language for Flexible Resource Adequacy Criteria Must-Offer Obligation ("FRAC-MOO"), posted on June 27, 2014:

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|-------------------------|---|
| Section 40.10.1.2(b)(2) | Is there a minimum MW size for the requirement to identify individual or aggregated wind and solar resources interconnected at the distribution level? If so, specify in this subsection.   |
| Section 40.10.1.2.1(d)  | It is not clear what sub-section (2) adds to sub-section (1). If a difference in treatment is intended depending on whether the study is re-run prior to or after May 1, the difference should be clarified. If no difference is intended, the May 1 reference in sub-section (1) and the entire sub-section (2) should be deleted. |
| Section 40.10.1.3       | In the first line <sup>1</sup> , change "ISO" to "CAISO".   |
| Section 40.10.3.2(a)    | In the first line, change "ISO" to "CAISO".   |
| Section 40.10.3.3       | This section describing the Peak Ramping Resource category also should include provisions allowing combined or bundled designation of Use-Limited Resources.  |
| Section 40.10.3.3(a)    | In the first line, change "ISO" to "CAISO".   |
| Section 40.10.3.4       | This section describing the Super-Peak Ramping Resources category also should include provisions allowing combined or bundled designation of Use-Limited Resources.   |
| Section 40.10.3.4(b)(1) | In the fourth line, delete "daily" and insert "each weekday that is not a holiday".   |
| Section 40.10.3.4(e)(5) | In the second line, change "ISO's" to "CAISO's".  |
| Section 40.10.4.2(a)(1) | In the fifth line, delete "to".   |

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<sup>1</sup> Line numbers refer to the lines in the redlined version of the revised draft tariff language posted on June 27, 2014.

- Section 40.10.4.2(a)(2) In the fourth line, delete “to”.
- Section 40.10.4.2.1(a)(1) In the sixth line, change “provides” to “provide”.
- Section 40.10.5.1(b)(1) In the third line, insert after “CAISO” “(but need not demonstrate satisfaction of the minimum or maximum Flexible Capacity Category requirements applicable to the Monthly Plan under Section 40.10.5.1(c)”.
- Section 43.2.7.1 In the fourth line, delete “but”.
- Section 43.2.7.1(1) In the second line, delete “, identifies the Load Serving Entities that are deficient,”. The Six Cities do not believe it is constructive to identify deficient LSEs in a market-wide notice, as it would place such LSEs at a disadvantage in seeking to procure resources to cure the deficiencies.
- Add a new sub-section (2) stating “(2) notify any Load Serving Entities that are deficient and any Local Regulatory Authorities having jurisdiction over such deficient Load Serving Entities;”.
- Re-number the current sub-section (2) as sub-section (3).
- Section 43.4.3 In the third line, insert “a” after “that”.
- Section 43.5.1 Change the first two sentences to read as follows:
- “Capacity and CPM Flexible Capacity from resources designated under the CPM shall be subject to all of the availability, dispatch, testing, reporting, verification and any other applicable requirements imposed under Section 40.6 or Section 40.10.6 as applicable on Resource Adequacy Resources and Flexible RA Capacity resources identified in Resource Adequacy Plans. In accordance with those requirements, CPM Capacity and CPM Flexible Capacity designated under the CPM shall meet the Day-Ahead availability requirements specified in Section 40.6.1 and the Real-Time availability requirements of Section 40.6.2, and CPM Flexible Capacity shall meet the Day-Ahead and Real-Time availability requirements specified in Section 40.10.6.1.”**
- Section 43.5.2 In the third line, change “an” to “a”.
- In the sixth line, insert “a” before “resource”.
- In the ninth line, change “of” to “for which”.

- Section 43.6.1                      In the first line, change “an” to “a”.
- Section 43.6.2(3)                    In the first line, change “an” to “a”.
- Section 43.7.2.1.2                   In the first line, change “an” to “a”.
- Section 43.7.2.2                    In the twenty-first line, change “an” to “a”.
- Section 43.7.3                      In the fourth line, delete “are”.

Submitted by,

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