

Section	Party	Comment/Proposed Redline	ISO Response
9.3.1.3.3.2(c)(3)	Six Cities	The CAISO Outage Coordination Office will not approve a request for an RA Maintenance Outage Without Replacement earlier than seven days before the first day of the resource adequacy month, and may hold the request as pending until system conditions are sufficiently known for the CAISO to determine whether the outage meets the requirements in Section 9.3.1.3.3.2(c)(2); provided that the CAISO Outage Coordination Office will inform a Scheduling Coordinator that has submitted a request for an RA Maintenance Outage Without Replacement whether the request has been approved prior to the first day of the RA month.	The CAISO cannot commit to approving these outages prior to the first day of the month. System conditions may not be sufficiently known at that time. The outage may not begin until late in the month.  Will correct typo
9.3.1.3.3.4(a)	SDG&E	(a) <b>Option for Short-Notice Outage.</b> The Scheduling Coordinator for a Resource Adequacy Resource designated as Resource Adequacy Capacity during the resource adequacy month may submit a request for a Short-Notice Opportunity RA Outage without a requirement to provide -RA Replacement Capacity or RA Substitute Capacity for the Resource Adequacy Capacity that will be on the Forced Outage or de-rate.	Will correct typo
9.3.1.3.3.4(b)	SDG&E	(b) A Short-Notice Opportunity RA -Outage shall not exceed five days in length. The request for a Short-Notice Opportunity RA Outage must (i) be submitted no more than seven days prior to the requested start date for the outage, (ii) provide the CAISO Outage Coordination Office adequate time to analyze the request before the outage begins (iii) be submitted before the outage has commenced as a Forced Outage, and (iv) otherwise comply with the requirements of Section 9.	Will correct typo
9.3.1.3.3.4(c)(2)	CDWR	Will the approved outage cause RAAIM penalty? Or that since the assessment hours do not overlap with the time period of approved forced outage, they will not result in a penalty?? Sounds like there is a change here by deleting "not"	If the outage request is submitted 4 to 7 days in advance of the outage, it will be subject to RAAIM.
11.8.2.3.2	Six Cities	For an MSS Operator that has elected net Settlement, regardless of other MSS optional elections (Load following or	Will make the change

		<p>RUC opt-in or out), the Energy bid costs and revenues for IFM Bid Cost Recovery is settled at the MSS level. The IFM Bid Cost as described in Section 11.8.2.1 above and IFM Market Revenue as provided in Section 11.8.2.2 above, of each MSS will be, respectively, the total of the IFM Bid Costs and IFM Market Revenues over all BCR Eligible Resources within the MSS where each BCR Eligible Resource's IFM Market Revenues for its Energy shall be calculated as described in Section 11.2.3.2 at the relevant IFM MSS price. The IFM Bid Cost Shortfalls and Surpluses for Energy and AS are first calculated separately for the MSS for each Trading Hour of the Trading Day with qualified Start-Up Cost and qualified Minimum Load Cost included in the IFM Bid Cost Shortfalls and Surpluses for Energy calculation. The MSS's overall IFM Bid Cost Shortfall or Surplus is then calculated as the algebraic sum of the <del>prorated</del> IFM Bid Cost Shortfall or Surplus for Energy and the IFM Bid Cost Shortfall or Surplus for AS for each Trading Hour.</p>	
40.2.1.1(f)	PG&E	This section should be deleted.	Yes – it applies to 2013
40.2.4(1)	NCPA	<p><u>(1) Annual RA Plan.</u> Scheduling Coordinators for Load-following MSSs are subject solely to Sections 40.2.4, 40.3 and 40.10. A Scheduling Coordinator for a Load-following MSS must provide an annual Resource Adequacy Plan that sets forth, at a minimum, the Local Capacity Area Resources, if any, procured by the Load-following MSS as described in Section 40.3. The annual Resource Adequacy Plan shall utilize the annual coincident peak Demand determination provided by the California Energy Commission for such Load-following MSS using Demand Forecast data submitted to the California Energy Commission by the Load-following MSS, or, if the California Energy Commission does not produce coincident peak Demand Forecasts for the Load-following MSS, the annual coincident peak Demand Forecast produced by the CAISO for such Load-following MSS in accordance with its Business Practice Manual using Demand Forecast data submitted to the CAISO by the</p>	This is not correct. Load-following MSS's are subject to those provisions and other applicable RA provisions.

		Load-following MSS.	
40.2.4(2)	NCPA	<del>(2) Monthly RA Plan and Supply Plan. The Scheduling Coordinator for a Lead following MSS must submit a monthly RA Plan and Supply Plan on the schedule set forth in the Business Practice Manual.***</del>	Will make this change
40.6.1	SDG&E	ISO has renamed Use-Limited Resources to ULCs as part of CCE2. How will this affect the other 24 references to Use-Limited Resources here?	Conforming changes for tariff modifications in CCE2 will be included in proposed tariff language for CCE2
40.6.1	SDG&E	Scheduling Coordinators supplying Resource Adequacy Capacity shall make the Resource Adequacy Capacity, available Day-Ahead to the CAISO, except as provided in Section 40.6.1(2) for <del>extremely_Extremely longLong_start_Start unitsResources</del> , Section 40.6.1.1 for specific resource types, and Section 40.6.4 for Use-Limited Resources, as follows:	Will capitalize
40.6.1.1(b)	PG&E	The term “physically available” in Sections 40.6.1.1(b) and 40.6.4.3.5 should be consistent with the existing Tariff language of “physically capable of operating”. The existing tariff uses the term “physically capable of operating” in Section 40.6.1 on Day-Ahead availability. However, the proposed tariff language in Sections 40.6.1.1(b) and 40.6.4.3.5 uses the term “physically available”. The CAISO should replace the term “physically available” in the proposed tariff language with “physically capable of operating” in order to maintain consistency.	Will make the change
40.6.1.1(c)	PG&E	The language in Sections 40.6.1.1(c) and 40.6.2(f) is redundant with the language in Tariff Section 40.6.1(2).	Will remove redundancy
40.6.2(f)	PG&E	The language in Sections 40.6.1.1(c) and 40.6.2(f) is redundant with the language in Tariff Section 40.6.1(2).	Will remove redundancy
40.6.4.3.2	SDG&E	Hydroelectric Generating Units, Pumping Load, and Non-	Will correct typos

		Dispatchable Use-Limited Resources, but not Reliability Demand Response Resources, shall submit Self-Schedules or Bids in the Day-Ahead Market for their expected available Energy or their expected as-available Energy, as applicable, in the Day-Ahead Market and RTM. Such resources shall also revise their Self-Schedules or submit additional Bids in RTM based on the most current information available regarding Expected Energy deliveries. Hydroelectric Generating Units, Pumping Load, Reliability Demand Response Resources, Non-Dispatchable Use-Limited Resources, -Resource Adequacy Resources providing Regulatory Must-Take Capacity are not required to submit RUC Availability Bids for that capacity, but any such bids they do submit must be \$0/MW RUC Availability Bids. – The CAISO will retain discretion as to whether a particular resource should be considered a Non-Dispatchable Use-Limited Resource, and this decision will be made in accordance with the provisions of Section 40.6.4.1.	
40.6.4.3.2	PG&E	<p><b>The CAISO should clarify whether Resource Adequacy Variable Energy Resources are included in the Residual Unit Commitment exemptions under Section 40.6.4.3.2.</b></p> <p>The proposed tariff language in Section 40.6.4.3.2 exempts hydroelectric generating units, pumping load, reliability demand response resources, non-dispatchable use-limited resources, and resource adequacy (RA) resources providing regulatory must-take capacity from the requirement to submit residual unit commitment (RUC) availability bids. It is unclear whether RA Variable Energy Resources (VERs) are also exempt from RUC. In the RSI Proposal, the CAISO proposes new policy rules for RA resources to account for the new use-limited definition in the Commitment Cost Enhancements Phase 2 initiative. Specifically, the CAISO proposes to revise RA rules to maintain exemptions for resources previously exempt under the previous use-limited definition, but will no longer be</p>	RA Variable Energy Resources (VERs) will be exempt from RUC bid insertion; however, will have their bids zeroed out after the fact. Section 31.5.3 allows the ISO to adjust the CFCD by estimated incremental real-time bids from participating intermittent resources.

		exempt after implementation of the new policy. The CAISO should clarify whether RA VERs fit under this category and will also be exempt from RUC.	
40.6.4.3.2	PG&E	<p><b>The CAISO should clarify whether storage resources that are not considered non-generator resources are included in the bid insertion exemptions under Section 40.6.8(e) and Residual Unit Commitment exemptions under Section 40.6.4.3.2.</b></p> <p>The proposed tariff language in Section 40.6.8(e) exempts non-generator resources (NGRs) from bid insertion in the Day-Ahead Market or Real-Time Market, and the proposed tariff language in Section 40.6.4.3.2 exempts hydroelectric generating units, pumping load, reliability demand resources, non-dispatchable use-limited resources, and resource adequacy (RA) resource providing regulatory must-take capacity from RUC availability requirements. It is unclear whether all other storage resources are exempt from bid insertion and RUC requirements. While the CAISO contemplates storage resources such as participating load or pumped storage, which are already deemed use-limited and thus exempt from bid insertion, the CAISO does not consider other storage resources such as compressed air energy storage (CAES) resources. The CAISO should clarify whether other storage resources that are not considered non-generator resources are exempt from bid insertion and RUC requirements.</p>	At this time, the only CAISO model for an energy storage resource is as an non-generator resource.
40.6.4.3.2	Six Cities	Hydroelectric Generating Units, Pumping Load, and Non-Dispatchable Use-Limited Resources, but not Reliability Demand Response Resources, shall submit Self-Schedules or Bids in the Day-Ahead Market for their expected available Energy or their expected as-available Energy, as applicable, in the Day-Ahead Market and RTM. Such resources shall also revise their Self-Schedules or submit additional Bids in RTM based on the most current information available regarding Expected Energy deliveries. Hydroelectric Generating Units, Pumping Load, Reliability Demand Response Resources, Non-Dispatchable Use-Limited Resources, <u>and</u> Resource Adequacy Resources providing	Will correct typo

		Regulatory Must-Take Capacity are not required to submit RUC Availability Bids for that capacity, but any such bids they do submit must be \$0/MW RUC Availability Bids. – The CAISO will retain discretion as to whether a particular resource should be considered a Non-Dispatchable Use-Limited Resource, and this decision will be made in accordance with the provisions of Section 40.6.4.1.	
40.6.4.3.2	CDWR	<p>Participating Load (PL) which is a Pumping Load functions on a model that allows only non-spin ancillary service in the DAM and RTM energy bid for the DAM A/S non-spin award. This language does not fit in case of a PL. One sentence should be added:</p> <p>“Participating Load that is a Pumping Load shall submit Non-Spin Ancillary Service bids or self-provision in the Day-Ahead Market and energy bid in the RTM for the DAM A/S award capacity.”</p> <p>This proposed language aligns with the current participating load model and the participating load agreement between CDWR and the CAISO.</p>	<p>Will include the language with one modification –</p> <p>“Participating Load that is a Pumping Load shall submit <b>Non-Spin</b> Ancillary Service bids or self-provision in the Day-Ahead Market and energy bid in the RTM for the DAM A/S award capacity.”</p>
40.6.4.3.2	CDWR	What is the difference between these two phrases (“expected available energy” and “expected as-available energy”? What do they mean?	This is existing tariff language. No change is proposed.
40.6.4.3.5	PG&E	<p>The term “physically available” in Sections 40.6.1.1(b) and 40.6.4.3.5 should be consistent with the existing Tariff language of “physically capable of operating”.</p> <p>The existing tariff uses the term “physically capable of operating” in Section 40.6.1 on Day-Ahead availability.</p> <p>However, the proposed tariff language in Sections 40.6.1.1(b) and 40.6.4.3.5 uses the term “physically available”. The CAISO should replace the term “physically available” in the proposed tariff language with “physically capable of operating” in order to maintain consistency.</p>	Will make this change
40.6.8(e)	SDG&E	This is confusing. The draft Final proposal indicates that the ISO	Will revise the tariff language to

		will insert bids for Non-Resource Specific System Resource. Please clarify the inclusion here.	indicate that the CAISO will insert generated bids for a Non-Resource Specific System Resource during the 5 assessment hours if the resource is not on an outage and has not submitted a bid.
40.8.1.13	NRG	A Proxy Demand Resource must have the ability to (i) be dispatched for at least twenty-four hours per month, (ii) be dispatched <del>for on</del> at least three consecutive days, and (iii) respond for at least four hours per dispatch in order to qualify as Resource Adequacy Capacity. The Qualifying Capacity of a Proxy Demand Resource, for each month, will be based on the resource's average monthly historic demand reduction performance during that same month during the Availability Assessment Hours, as described in Section 40.9.3, using a three-year rolling average. For a Proxy Demand Resource with fewer than three years of performance history, for all months for which there is no historic data, the CAISO will utilize a monthly megawatt value as certified and reported to the CAISO by the Demand Response Provider; otherwise, where available, the CAISO will use the average of historic demand reduction performance data available, by month, for a Proxy Demand Resource.	Will make the change
40.8.1.15	PG&E	The reference in Section 40.8.1.15(a) should refer to Section 40.6 (not 4.6).	No, section 4.6 is correct
40.9	SDG&E	<b>40.9. <u>RA-Resource Adequacy Availability Incentive Mechanism</u></b>	Will make the change
40.9.2(a)(3)-(5)	NCPA	(3) <u>Resource Adequacy Resources of a Load-following MSS</u> ; (43) Participating Load that is also Pumping Load; and (54) RMR Units.	Will modify the tariff language to exempt the RA capacity of a load-following MSS provided to a load-following MSS

		This language is consistent with Section 6.14 of the Reliability Services Draft Final Proposal Addendum.	
40.9.2(b)(2)	NCPA	<del>(2) A resource with a Load following MSS as its Scheduling Coordinator is exempt from the RAAIM provisions in Section 40.9 applicable to local and system Resource Adequacy Capacity, to the extent that the resource's capacity is designated as Resource Adequacy Capacity on that Load following MSS's monthly Supply Plan.</del>	Will modify the tariff language to be consistent with edits to 40.9.2(a)(3)-(5)
40.9.2(b)(3)(A)	NRG	(A) if the QF resource previously provided Resource Adequacy Capacity pursuant to an Existing QF Contract that was executed prior to the August 22, 2010 and remained in effect pursuant to California Public Utilities Commission Decision 07-09-040 that extended the term of expiring contracts until such time as the new contracts resulting from that decision are available; or	Will correct typo
40.9.2(b)(3)(B)	NRG	Not sure what this is trying to say	This is existing tariff language that exempted QFs from SCP. If the new contracts resulting from the CPUC decision are available, this section may no longer be necessary.
40.9.2(c)	Six Cities	(c) <b>Resources Exempt from RAAIM – Flexible-Use-Limited Capacity.</b> The entire capacity of Use-Limited Resources in a combination under Section 40.10.3.2(b), 40.10.3.3(b) or 40.10.3.4(b) is exempt from the RAAIM provisions in Section 40.9 applicable to Flexible RA Capacity. <u>In addition, the entire capacity of any Use-Limited Resource that has exhausted its use limits for a specified time period is exempt from the RAAIM for the remainder of such time period.</u>	Will clarify the tariff language to indicate that the combined capacity of the resources is exempt from RAAIM only to the extent it is committed as a combined resource.  Section 40.9.3.6 excludes a short-term use limit reached.
40.9.2.1	SDG&E	Are QFs not part of “Acquired Resources”?	Acquired resources applies to contracts that were exempt

			under SCP, not to resource types
40.9.2.1(a)	Six Cities	<p>(a) <b>Exemption.</b> The entire capacity of an Acquired Resource is exempt from the RAAIM provisions in Section 40.9 applicable to local and system Resource Adequacy Capacity if the resource provides Resource Adequacy Capacity under a resource-specific power supply contract that <u>was exempt from the Standard Capacity Product as of the RAAIM effective date and continues to meet the requirements for that exemption, under the provisions contained in Appendix XX, and --</u></p> <p>(1) <u>was exempt from the Standard Capacity Product as of the RAAIM effective date, and continues to meet the requirements for that exemption, under the provisions contained in Appendix XX;</u></p> <p>(21) <u>includes a penalty for nonperformance; and/or</u></p> <p>(32) <u>does not contain a provision that allows the contract to be modified for regulatory changes.</u></p>	The CAISO intends to limit the exemption to those contracts that already include a performance provision and that cannot be reopened to conform that provision to RAAIM. That is consistent with the reason the exemption was initially created.
40.9.2.1(a)(1)	SDG&E	Standard Capacity Product is undefined in the existing tariff definitions. It may be better to use similar language that was used in 40.9.2(b)(3)(a) and find the correct Decision.	Will clarify the reference.
40.9.2.1(a)(1)	SDG&E	Is the reference to Appendix XX a placeholder?	Yes
40.9.2.1(a)(2)-(3)	PG&E	<p><b>The proposed tariff language in Sections 40.9.2.1(a)(2) and 40.9.2.1(a)(3) regarding RAAIM exemptions for Acquired Resources should be modified to accurately reflect the RSI Proposal.</b></p> <p>In the RSI Proposal, the CAISO proposes to exempt acquired resources from the generic RAAIM under the following conditions:</p> <ul style="list-style-type: none"> <li>② Capacity must be under a resource specific contract that existed prior to June 28th, 2009, AND</li> <li>② The scheduling coordinator for the capacity must specifically seek an exemption each year and demonstrate to the ISO that the resource's RA contract: <ul style="list-style-type: none"> <li>o Includes penalties for nonperformance, or</li> <li>o Does not have a reopen clause due to ISO market design</li> </ul> </li> </ul>	See response above

		<p>changes.</p> <p>The proposed tariff language in Sections 40.9.2.1(a)(2) and 40.9.2.1(a)(3) does not accurately reflect the RSI Proposal. The proposed tariff language indicates that an acquired resource's RA contract must include a penalty for nonperformance and does not contain a provision that allows the contract to be modified for regulatory changes. The first inconsistency is that in the proposed tariff language an acquired resource's RA contract must include both provisions to be exempt from the RAAIM instead of either provision as proposed in the RSI Proposal. The second inconsistency is that in the proposed tariff language an acquired resource's RA contract must not contain a provision that allows the contract to be modified for regulatory changes, which is different than due to market design changes as proposed in the RSI Proposal. The proposed tariff language should be modified to accurately reflect the RSI Proposal.</p>	
40.9.2.1(b)(1)	SDG&E	The Attestation was already submitted to the ISO for 2015 compliance year. So the year should be changed to 2015.	The first affidavit under the RSI tariff changes will be submitted for compliance year 2016
40.9.2.1(b)(2)	SDG&E	Is the confirmation the same as an affidavit? Based on the current BPM language, the future thereafter years require an affidavit and not just a confirmation.	No. Confirmation will not require a sworn affidavit
40.9.2.1(b)(2)	Six Cities	(2) for each Resource Adequacy Compliance Year thereafter until the contract terminates, submit confirmation to the CAISO <u>(either in email or written format)</u> that the information in the affidavit is still accurate and the Acquired Resource continues to meet the eligibility criteria in Section 40.9.2.1(a), in accordance with the process and schedule in Business Practice Manual.	Include in BPM
40.9.2.1(c)	SDG&E	<p>(c) <b>Approval.</b> The CAISO shall review the information submitted and <u>within 20 business days</u> –</p> <p>SDG&amp;E would like the ISO to define the time for when the ISO will respond to Market Participants within the Tariff and not the</p>	The timeline should remain in the BPM.

		BPM. SDG&E has experienced ISO not complying with BPM schedule on other affidavit submissions. Having these dates in the Tariff can hopefully ensure ISO staff meet their deadlines.	
40.9.2.1(c)(1)	Six Cities	(1) approve a request that contains the information required by Sections 40.9.2.1(a) and (b) <u>that</u> demonstrates the resource meets the eligibility criteria in Section 40.9.2.1(a);	Will make the change
40.9.2.1(c)(2)	Six Cities	(2) advise the Scheduling Coordinator for the resource <u>that</u> <u>if</u> the request does not contain all of the information required by Sections 40.9.2.1(a) and (b), and allow the opportunity for the Scheduling Coordinator to submit the additional required information, in accordance with the process and schedule in the Business Practice Manual; or	Will make the change
40.9.2.1(c)(3)(B)	Six Cities	(B) the Scheduling Coordinator for the resource does not submit, or does not timely submit, additional information required to complete the request under <del>with</del> Section 40.9.2(c)(2); or	Will correct the typo
40.9.3.1(a)(2)(C)	NRG	(C) apply to each Trading Day that is a weekday and <u>not</u> a <del>non</del> -federal holiday.  A non-federal holiday could be a state holiday?	Will make the change
40.9.3.2(d)	NRG	(d) <b>Start-Up Less Than 90 Minutes.</b> For resources with a start-up time less than 90 minutes, the CAISO will use the resource's MWs of capacity from zero to PMax to assess the availability of the designated Flexible RA Capacity; provided that the Scheduling Coordinator for the resource does not submit Self-Schedules for the capacity from zero to PMin or for any portion of the capacity under the must-offer obligation for Energy. If the Scheduling Coordinator for the resource submits a Self-Schedule <u>for the resources Pmin Energy</u> , the CAISO will deduct the MW value of PMin from the calculation of the resource's Flexible RA Capacity availability,	The proposed change is not correct. Any self-schedule will be deducted from the PMin value.

40.9.3.2(d)	SDG&E	Please clarify this section. It reads as if an RA resource cannot be partially committed for Flexibility. Should it be "If the SC for the resource submits a Self-Schedule of any portion of capacity under the MOO for Energy, the CAISO will deduct that MW value from the calculation of the resource's Flex RA capacity availability"?	See response above
40.9.3.2(e)	SDG&E	Should this MW level include the weighted average ramp rate? The capacity between the PMin and PMax may be greater than that of the EFC allowed.	Will modify the language – ...the CAISO will use the resource's MWs of capacity between PMin and <u>PMaxEFC</u> in the availability assessment ...
40.9.3.2(f)(2)	SDG&E	If the FRAC was 80MW out of 100MW EFC, then the ratio will be 80%. However if the SC bids only 80MWs, then the ISO will apply 80% to the 80MW bid?	Will modify the language – ... and applies that ratio to the MWs of Economic Bids <u>submitted for the Flexible RA Capacity and the VER forecast.</u>
40.9.3.2(f)(3)	SDG&E	(3) <b>VER Forecast Less Than Flexible RA Capacity.</b> If the MWs in the VER forecast are less than the MWs of Flexible RA Capacity designated in the monthly Resource Flexible RA Capacity Plan, and the Economic Bids are greater than or equal to the forecast amount <u>for that hour</u> , the resource is 100 percent available up to the forecast amount.  Language could be interpreted to mean 100% for the month	Will make this change
40.9.3.2(f)(4)	SDG&E	(4) <b>VER Forecast Greater Than Flexible RA Capacity.</b> If the MWs in the VER forecast are greater than the MWs of Flexible RA Capacity designated in the monthly Resource Flexible RA Capacity Plan, the Scheduling Coordinator for the resource must submit Economic Bids equal to the forecast amount. If the Scheduling Coordinator for the resource submits Economic Bids for MWs above the forecast, or the resource generates above the forecast, the CAISO limits availability <u>calculated</u>	Will make this change

		to calculation based on the forecast amount.	
40.9.3.3(c)(2)	NRG	(2) limit the total MWs of capacity <del>at to the higher lower of</del> the Resource Adequacy Capacity commitment or the Flexible RA Capacity commitment.	Will modify the language –  <u>limitcount</u> the total MWs of capacity at the higher of the Resource Adequacy Capacity commitment or the Flexible RA Capacity commitment.
40.9.3.4(b)	SDG&E	Would it be better to conform with language in Section 9 “submitted 45 days prior to the start date of the compliance month” rather than after the monthly supply plan? Should it also include the Flexible RA Plan in addition to the monthly Supply Plan?	Will change to 45 days prior to the start date of the compliance month. This applies to resources on a Supply Plan.
40.9.3.4(b)-(c)	PG&E	<b>The proposed tariff language should address RAAIM treatment of outages that an RA resource requests prior to submitting its monthly supply plan (i.e. more than forty-five days in advance of the RA month).</b>  The proposed tariff language in Sections 40.9.3.4(b) and 40.9.3.4(c) addresses treatment under RAAIM of outages that an RA resource requests after submitting its monthly supply plan. The proposed tariff language does not address RAAIM treatment of outages that an RA resource requests prior to submitting its monthly supply plan (i.e. more than forty-five days in advance of the RA month). Proposed tariff language should be included to address RAAIM treatment of these outages.	Will modify the language to clarify that requests for maintenance outages that are approved or pending as of T-45 will be excluded from RAAIM; however an incremental increase of the MWs on outage or the duration of the outage will be included in RAAIM unless replacement capacity is required and is provided
40.9.3.4(b)	NRG	(b) <b>Replacement Requirement Provided.</b> For each Maintenance Outage that a Resource Adequacy Resource requested after submitting its monthly Supply Plan <u>that requires RA Replacement Capacity</u> -- (1) The RAAIM Availability Assessment for the resource excludes the capacity, duration, and must offer requirement for Resource Adequacy Capacity on an Approved Maintenance Outage to the extent the resource provides RA Replacement	Will make the change, but not the deletion

		<p>Capacity for that outage as required under Section 9.3.1.3.3; and</p> <p>(2) The RAAIM Availability Assessment for the replacement resource includes the capacity, duration, and must offer requirement for the RA Replacement Capacity commitment.</p>	
40.9.3.4(c)	SDG&E	<p>Would it be better to conform with language in Section 9 “submitted 45 days prior to the start date of the compliance month” rather than after the monthly supply plan? Should it also include the Flexible RA Plan in addition to the monthly Supply Plan?</p>	Will change to 45 days prior to the start date of the compliance month. This applies to resources on a Supply Plan.
40.9.3.4(c)	Six Cities	<p>(c) <b>Replacement Requirement Not Provided.</b> For each Maintenance Outage that a Resource Adequacy Resource requested after <del>submitted</del><sup>submitting</sup> its monthly Supply Plan, the RAAIM Availability Assessment for the resource includes the capacity, duration, and must offer requirement for Resource Adequacy Capacity on an Approved Maintenance Outage to the extent the resource does not provide RA Replacement Capacity for the outage as required under Section 9.3.1.3.3.</p>	Will correct the typo
40.9.3.5(c)	SDG&E	<p>(c) <b>Exclusions from RAAIM.</b> The RAAIM Availability Assessment excludes the capacity, -duration, and must offer requirement for local and/or system Resource Adequacy Capacity or Flexible RA Capacity on a Forced Outage in a nature of work category relating to an administrative action by the resource owner, a cause outside of the control of the resource owner, or a short-term use limitation, as those categories are specified in the Business Practice Manual.</p>	Will correct the typos
40.9.3.6(a)	SDG&E	<p>Is a de-rate not considered a Forced Outage? At what point does a de-rate that is not a Forced Outage require Substitute Capacity?</p>	A de-rate is a forced outage. The reference to de-rate is consistent with existing tariff language.
40.9.3.6.1(b)(1)(A)	SDG&E	<p>(A) <b>Annual Process.</b> The CAISO will annually conduct a process to assess the eligibility of resources to pre-qualify as RA Substitute Capacity for Local Capacity Resource Adequacy Resources. The CAISO will publish a list of Pre-Qualified</p>	Will make this change.

		<p>resources in accordance with the timeline in the Business Practice Manual.</p> <p>ISO agreed to publish the pre-qualified list and SCs will not have to request for the pre-qualification.</p>	
40.9.3.6.1(b)(1)(B)	SDG&E	Will there a technical definition of compatible bus?	The methodology for determining a compatible bus will be included in the BPM
40.9.3.6.1(c)(2)	SDG&E	Should “deliverable capacity” be adequate capacity not committed as Resource Adequacy Capacity or capacity from non-Resource Adequacy Resources	No, deliverable capacity means the resource has available capacity under its NQC.
40.9.3.6.1(d)(1)	SDG&E	Does this mean a Dynamic and non-Dynamic System Resources can be used?	Yes, but subject to import capability constraints
40.9.3.6.1(d)(2)	SDG&E	Should “deliverable capacity” be adequate capacity not committed as Resource Adequacy Capacity or capacity from non-Resource Adequacy Resources	See response above
40.9.3.6.1(e)(1)	SDG&E	<p>(1) <b>Request.</b> To use a resource as RA Substitute Capacity, the Scheduling Coordinator for the Flexible RA Resource that has a Forced Outage or de-rate must submit a timely substitution request in the Day-Ahead Market or Real-Time Market in accordance with Section 40.9.3.6(c) and specify the MW of RA Substitute Capacity to be provided, which may not exceed the MWs of the outage <u>and must specify the Flexible Capacity Category which may not be greater than the Flexible Capacity Category of the outage.</u></p>	No, substitute flexible capacity must the same or a higher quality category
40.9.3.6.2(b)(1)	SDG&E	Is the request only for the pre-qualified resource? Or will it be for both?	The request to use a pre-qualified resource can be submitted in the day-ahead or real-time market. The request to use a non-prequalified resource can only be submitted in the day-ahead market.
40.9.3.6.2(b)(2)	SDG&E	Should this [Local Capacity Area] be same bus or compatible	No. A resource in the same local

		bus?	capacity area can be used.
40.9.3.6.2(c)(1)	SDG&E	(1) <b>Request.</b> To use RA Substitute Capacity from multiple resources, the Scheduling Coordinator for a non-Local Capacity Area Resource Adequacy Resource or an NRS-RA Resource on a Forced Outage or de-rate must submit a timely substitution request in the Day-Ahead Market in accordance with Section 40.9.3.6(c) and the alternate resources must be located within the CAISO Balancing Authority Area, <u>which does not include a Pseudo-Tie of a Generating Unit or a Resource-Specific System Resource to the CAISO Balancing Authority Area.</u>	Will modify the tariff language to add a new provision specific to non-resource specific system resources.
40.9.3.6.2(c)(2)	SDG&E	(2) <b>Approval.</b> The CAISO will grant the request if the alternate resources meet the requirements in Sections 40.9.3.6.2(c)(1) and 40.9.3.6(c).	Will make this change
40.9.3.6.2(d)(1)	NRG	(1) <b>Request.</b> To use RA Substitute Capacity from multiple resources, the Scheduling Coordinator for a resource providing Flexible RA Capacity on a Forced Outage or de-rate must submit a timely substitution request in the Day-Ahead Market or the Real-Time Market and the alternate resources <u>must</u> be located in the CAISO Balancing Authority Area.	Will make this change
40.9.3.6.2(d)(1)	SDG&E	(1) <b>Request.</b> To use RA Substitute Capacity from multiple resources, the Scheduling Coordinator for a resource providing Flexible RA Capacity on a Forced Outage or de-rate must submit a timely substitution request in the Day-Ahead Market or the Real-Time Market and the alternate resources <u>must</u> be located <u>internal in to</u> the CAISO Balancing Authority Area, <u>which does not include a Pseudo-Tie of a Generating Unit or a Resource-Specific System Resource to the CAISO Balancing Authority Area.</u>  To be consistent with language in 40.9.3.6.1(d)(1)	Will make this change
40.9.3.6.2(d)(2)	SDG&E	(2) <b>Approval.</b> The CAISO will grant the request if the	Will make this change

		alternate resources meet the requirements in Sections 40.9.3.6.3.2(d)(1) and 40.9.3.6(c).	
40.9.3.6.2(e)	PG&E	The Section reference is missing at the end of the clause in Section 40.9.3.6.2(e).	Will insert Section 40.9.3.6.3
40.9.3.6.2(e)	SDG&E	(e) If the request includes an alternate resource providing RA Substitute Capacity for another resource during the same period, that alternate resource must submit a separate request to provide to RA Substitute to multiple resources in accordance with Section 40.9.3.6.3.	Same as previous
40.9.3.6.3(b)	NRG	(b) <b>Approval.</b> The CAISO will approve the request if the alternate resources are located within the CAISO Balancing Authority Area <u>and</u> meet the requirements in Section 40.9.3.6(c).	Will make this change
40.9.3.6.3(b)	SDG&E	(b) <b>Approval.</b> The CAISO will approve the request if the alternate resources <u>are located within the CAISO Balancing Authority Area</u> , meet the requirements in Section 40.9.3.6(c), 40.9.3.6.1 and 40.9.3.6.2.  Referring back to the previous Sections ensures the requirements of various scenarios are met.	The original language is correct
40.9.3.6.4	SDG&E	There needs to be an option (c) where substitute capacity is released automatically if the FO ends early and neither SC has to be involved.	No, the tariff language intends that both SCs sign off on early release of the substitute capacity so they are directly aware of the change in the must offer obligation.
40.9.3.6.4(b)	SDG&E	(b) upon request by either the Scheduling Coordinator for the resource on <u>Forced Outage</u> or the Scheduling Coordinator for the substitute resource, and approval by the other Scheduling Coordinator, in accordance with the process set forth in the Business Practice Manual.	Will make this change
40.9.3.6.5(2)	SDG&E	The ISO agreed to penalize and incentivize the Substitute RA	That is correct. Will modify the

		capacity separate from the Resource on Outage. Any unavailability is the responsibility of the Substitute resource.	tariff language to clarify that the failure to bid will be taken into account in determining the availability of the substitute resource.
40.9.4(a)(2)	PG&E	Section 40.9.4(a)(2) is missing the word "the" in "to the extent".	Will correct this typo
40.9.4(a)(2)	SDG&E	Section 40.9.4(a)(2) is missing the word "the" in "to the extent".	same
40.9.4(a)(4)	Six Cities	Sub-section (a)(4) should b (b) <b>Approval.</b> The CAISO will approve the request if the alternate resources are located within the CAISO Balancing Authority Area <u>and</u> , meet the requirements in Section 40.9.3.6(c).e clarified, as there is no specific reference to Maintenance Outages in Section 40.9.3.5.	Will make the change. Maintenance Outages s/b Forced Outages -- in Section 40.9.3.5(c)
40.9.4(b)	SDG&E	(b) If the resource's minimum daily availability is the same in the Day-Ahead Market and the Real-Time Market, the CAISO will use the availability in the Real-Time Market in the calculation of the monthly <u>average</u> availability <u>average</u> .  Section 40.9.4(a) uses the term monthly average availability.	Will make the change
40.9.5	SDG&E	This section and term should be renamed to Availability Standard since this is already defined in the Tariff and used in 40.9.6.2(b)	Will make the change
40.9.6.1(a)(1)	Six Cities	"average monthly RA and Flexible RA MWs" should be clarified to state how the "average monthly RA and Flexible RA MWs" are determined	This will be addressed in the BPM
40.9.6.1(a)(1)	SDG&E	Can this [monthly RA and Flexible RA MWs] be interpreted to be 180MWs out of a 100MW Flexible Resource? 100MW of RA & 80MWs of Flex? Or average as in 90MWs?	This will be addressed in the BPM
40.9.6.1(a)(1)	NRG	The CAISO should publish some examples of how this calculation works based on this rather terse description. For example – how will the "average monthly RA and Flexible RA MWs" be determined?	Will include examples in the BPM
40.9.6.1(a)(2)	Six Cities	"average monthly CPM MWs" should be clarified to state how the "average monthly CPM MWs" are determined	This will be addressed in the BPM

40.9.6.1(b)	PG&E	The Section reference is missing at the end of the clause in Section 40.9.6.1(b).	Will insert section number from CPM filing.
40.9.6.1(b)	Six Cities	(b) <b>RAAIM Price.</b> The RAAIM price shall be 60 percent of the CPM <del>soft cap</del> <ins>Soft Offer Cap</ins> price in Section	Will make the change
40.9.6.2(b)	Six Cities	It is not clear how the amount described in the phrase “average monthly MWs of capacity that exceed the upper bound of the Availability Standard” would be determined. The Six Cities suggest that the elements of the calculation be specified.	This will be addressed in the BPM.
40.9.6.2(c)(3)	Six Cities	It is not clear how the situation in the phrase “except that the CAISO shall prorate the payments if the Non-Availability Charges and unpaid funds under Section 40.9.6.2(d) are less than the full payment amount” could occur, since the Availability Incentive Payment rate will be based on the Non-Availability Charge funds divided by the capacity eligible to receive payments.	Will modify the tariff language – ... <del>except that the CAISO shall prorate the payments if the Non-Availability Charges and unpaid funds under Section 40.9.6.2(d) are less than the full payment amount</del>
40.9.6.2(d)	Six Cities	(d) Unpaid Funds. Any <del>remaining</del> Non-Availability Charge funds that are not distributed to <del>eligible</del> Resource Adequacy Resources <ins>eligible to receive Availability Incentive Payments in a month</ins> will be added to the funds available for Availability Incentive Payments in the next month and will continue to roll over to the successive month until paid out or December 31, at which time the funds will be distributed to Load Serving Entities based on their load ratio share for the year.	Will make the change
40.10.1.2(b)(2)	NCPA	(2) identifies each wind and solar resource connected to the CAISO Controlled Grid, and distributed wind and solar resources, that is owned, in whole or in part, by the Load Serving Entity, or under contractual commitment to the Load Serving Entity <del>or the Load following MSS Load Serving Entity</del> , for all or a portion of its capacity;	Will not make this edit, absent further explanation
40.10.2.2(a)(1)-(2)	NCPA	NCPA believes its proposed edits in this Section are consistent with Section 4.6 of the Reliability Services Draft Final Proposal	Will not accept the proposed changes in (1). Will modify the

		<p>Addendum.</p> <p>(1) <u>MSS Contribution equals</u> the Local Regulatory Authority's average percent contribution to the change in wind output, minus the <u>average percent contribution to the</u> change in solar PV output, minus the <u>average percent contribution to the</u> -change in solar thermal output, during the five highest three-hour net load changes in the month, for <u>wind, solar PV and solar thermal</u> resources not included in the Load-following MSS Load Serving Entity's resource portfolio; and</p> <p>(2) plus the lesser of <u>the MSS Contribution to the Load-following MSS Load Serving Entity's contribution to the three-hour net load ramp</u> or 3.5 percent of its forecasted peak load.</p>	<p>tariff language –</p> <p>(2) plus the lesser of the MSS Contribution as in Section 40.10.2.2(a)(1) or 3.5 percent of its forecasted peak load.</p>
40.10.2.2(c)	NCPA	<p>(c) If the <u>MSS Contribution to the Load-following MSS Load Serving Entity's contribution to the three-hour net load ramp</u> is less than its contribution to the 3.5 percent of expected peak load, the CAISO does not reallocate that difference to other LRAs to determine whether a cumulative deficiency in Flexible RA Capacity exists under Section 43.2.7.</p>	Will not make this change
40.10.2.2(d)	NCPA	<p>(d) <u>Included in the information provided by a Load-following MSS Load Serving Entity pursuant to Section 40.10.1.2, the Load-following MSS Load Serving Entity is required to identify which variable energy resources are, and are not, included in the Load-following MSS Load Serving Entity's portfolio. If a Load-following MSS Load Serving Entity submits information identifying a variable energy resource as being included in the Load-following MSS Load Serving Entity's portfolio for a particular month, but prior to the date on which a monthly LSE Flexible RA Capacity Plan is due to be submitted to the CAISO for such month, it is determined that the variable energy resource was not incorporated into the Load-following MSS Load Serving Entity's portfolio, the Load-following MSS Load Serving Entity's monthly Flexible Capacity Need will be</u></p>	Will include this language in Section 40.10.5.1.1(2) in lieu of the language NCPA requested be deleted

		<p>increased by an amount equal to the MW amount of the variable energy resources that was initially identified as being included in the Load-following MSS Load Serving Entity's portfolio for that month.</p>	
40.10.5.1.1	NCPA	<p>NCPA believes this language is consistent with Section 4.6 of the Reliability Services Draft Final Proposal Addendum, in that NCPA is only required to submit a LSE Flexible RA Capacity Plan to demonstrate those Flexible RA Capacity resources it is using to satisfy its Flexible Capacity Need (that is based only on those variable energy resources that are modeled as being external to the Load-following MSS portfolio).</p> <p>(1) Each Load-following MSS Load Serving Entity for which the CAISO has calculated an allocable share of the Flexible Capacity Need under Section 40.10.2.2 must submit annual and monthly LSE Flexible RA Capacity Plans pursuant to this Section 40.10.5.1 <u>to identify the Flexible RA Capacity it is using to satisfy such requirement.</u></p> <p>(2) <del>If a Load following MSS submits a monthly LSE Flexible RA Capacity Plan identifying variable energy resources it will rely on to provide Flexible RA Capacity that were not included in its MSS resource portfolio, the Load-following MSS must include additional Flexible RA Capacity in its plan equal to the MW amount of Flexible RA Capacity shown for the variable energy resources not included in the MSS resource portfolio for that month.</del></p>	<p>Will make the change in (1)</p> <p>Will make the deletion in (2) and replace that language with the suggested language</p>
Appendix A - Availability Standards	SDG&E	<p><b>- Availability Standards</b></p> <p>The standard established in accordance with Sections 40.9.4 and 40.9.76 to determine if a Resource Adequacy Resource is subject to Non-Availability Charges or Availability Incentive Payments.</p>	<p>Will modify –</p> <p><b>- Availability Standards</b></p> <p>The standard <del>established in accordance with Sections 40.9.4 and 40.9.76</del> used to determine if a Resource Adequacy Resource is</p>

			subject to Non-Availability Charges or Availability Incentive Payments.
Appendix A - Regulation Energy Management	SDG&E	<p><b>- Regulation Energy Management</b></p> <p><del>THIS TARIFF SECTION WILL BECOME EFFECTIVE ON NOVEMBER 27, 2012.</del></p> <p>A market feature for resources located within the CAISO Balancing Authority Area that require Energy from the Real-Time Market to offer their full capacity as Regulation, as described in Section 8.4.1.2.</p>	Will delete