

February 12, 2016

**COMMENTS ON BEHALF OF THE CITIES OF
ANAHEIM, AZUSA, BANNING, COLTON, PASADENA,
AND RIVERSIDE, CALIFORNIA
ON PRR 885 RECOMMENDATION**

PRR 885 - - Settlements and Billing, BPM Configuration Guide: Resource Adequacy
Availability Incentive Mechanism (RAAIM), Pre-calculation, Version 5.0:

Business Requirement ID, Section 3.6 (page 5): “Combined Flexible RA Capacity Resources” should be added as a new sub-item j. Combined Flexible RA Capacity resources are and remain exempt from RAAIM until implementation of Reliability Services Initiative Phase 2.

Section 3.6.9 (pages 23-27): Add the appropriate RAAIM exemption flag for combined Flexible RA Capacity resources. Combined Flexible RA Capacity resources are and remain exempt from RAAIM until implementation of Reliability Services Initiative Phase 2.

Section 3.7 – Output Requirements, Output Req ID 79 (page 53): For clarity, “to” in the second line of the description should be changed to “to and including” or “through”.

Section 3.7 – Output Requirements, Output Req ID 84 (page 54): In the second line of the description, change “rea” to “real”.

Section 3.7 – Output Requirements, Output Req ID 88 (page 54): For clarity, “to” in the second line of the description should be changed to “to and including” or “through”.

PRR 885 - - Settlements and Billing, BPM Configuration Guide: Monthly Resource Adequacy
Availability Incentive Mechanism Settlement CC 8830, Version 5.0:

Section 3.1 – Business Rules: For clarity and consistency, the Business Rules for CC 8830 should include the same statement as included in Business Rule 9.0 at page 5 of the BPM Configuration Guide for CC 8831, noting that the first two months of RAAIM will be advisory and explaining the use of the RAAIM advisory flag.

PRR 885 - - Settlements and Billing, BPM Configuration Guide: Monthly Resource Adequacy Availability Incentive Mechanism Allocation CC 8831, Version 5.0:

Section 3.7 – Output Requirements, Output Req IDs 9, 10, and 11 (page 12): The first sentence in the description for each of these items appears inconsistent and inaccurate. The Incentive Quantities for RAAIM, CPM, and flexible CPM are not subject to the Non Availability charge price. Rather, they are the quantities eligible to receive the Availability Incentive Payment, if any, applicable in a given month.

Submitted by,

Bonnie S. Blair
Rebecca L. Shelton
Thompson Coburn LLP
1909 K Street N.W., Suite 600
Washington, D.C. 20006-1167
bblair@thompsoncoburn.com
rshelton@thompsoncoburn.com
202-585-6905

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