

April 16, 2019

**COMMENTS OF THE CITIES OF ANAHEIM, AZUSA,
BANNING, COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA
ON PROPOSED REVISION REQUEST 1139**

In accordance with the Business Practice Manual (“BPM”) Change Management Process, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the “Six Cities”) provide their comments in support of the initial comments filed by Southern California Edison (“SCE”) and Pacific Gas and Electric Company (“PG&E”) in response to Proposed Revision Request (“PRR”) 1139, titled “Updates to nature of work attributes for generation outages & outage reporting section.” The CAISO states that the intent of the PRR is to update the nature of work attributes for generation outages and outage reporting within the Outage Management BPM.

The Six Cities support the initial comments submitted by SCE and PG&E in response to this PRR. Specifically, the Six Cities agree with SCE that changes to the “Ambient Not Due to Temp” nature of work “is a significant change that will impact entities’ [Resource Adequacy] showings as well as the use of available outage cards to manage complex hydro conditions,” and “will have significant impacts on showings already made and rules already relied upon to make those procurement decisions.” The Six Cities also support PG&E’s request that the CAISO remove the language “Non-temperature related unit availability derate that is outside the control of the plant operator” from the Ambient Not Due To Temp outage card, because, as PG&E explains, it “changes the meaning of the outage card substantially.” Finally, the Six Cities agree with PG&E’s recommendation to include a description for Water Management in the Ambient Not Due To Temp Purpose that would note the “physical limitation of hydro resources due to lack of water or lack of head.”

Submitted by,

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