

August 1, 2019

**COMMENTS OF THE CITIES OF ANAHEIM, AZUSA,
BANNING, COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA
ON PROPOSED REVISION REQUEST 1168**

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 response to Proposed Revision Request (“PRR”) 1168, titled “Outage card clarification for resources and must offer obligation clarification for Conditionally Available Resource (CAR) and other resources under Tariff section 40.6.4.1.”

Through PRR 1168, the CAISO proposes changes to the Outage Management BPM to revise the Ambient Not Due to Temp nature of work attribute for generation outages. The CAISO added language to this attribute stating that the Ambient Not Due to Temp attribute can be used by hydro units without qualifying use limits, among other resources, to notify the CAISO that the hydro resource’s expected available energy or expected as-available energy will be below the shown RA Capacity for the unit.

The Six Cities request clarification as to the specific hydro resources that would be eligible to use the Ambient Not Due To Temp nature of work outage card under the CAISO’s proposed revisions to the Outage Management BPM. The CAISO’s revisions refer only to “hydro resources without qualifying use limits,” and it is unclear from this language which hydro resource types are eligible to use the outage card. Specifically, the Six Cities request clarification as to whether the proposed revisions allow for Import Hydro to use the Ambient Not Due to Temp outage card to notify the CAISO that the resource’s expected available energy or expected as-available energy will be below the shown RA Capacity for the unit and avoid a substitution obligation and RAIM exposure.

Submitted by,

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