# Olivine Comments on PRR 1509

Olivine supports CAISO's proposed clarifications on usage of short-term use limit reached outage cards for PDRs. These changes allow PDRs that were not able to submit a Use Limit Plan to still manage their use limitations without facing potential exposure to RAAIM penalties. To date, it has been unclear whether PDRs can be registered as use-limited without explicit contract provisions specifying limitations. Some DR resources have been called for five hours despite many customers only agreeing to four-hour availability. We appreciate CAISO acknowledgement of the CPUC's MCC bucket for demand response that spells out applicable limitations for daily, monthly, and consecutive dispatch day limitations.