



February 18, 2026

RE: CPA Initial Comments on Proposed Revision Request “PRR” 1658 and 1659

Clean Power Alliance of Southern California (CPA) appreciates the opportunity to comment on PRR 1658 “Clarifications on use of the off grid charging indicator” and PRR 1659 “Flexible resource adequacy showings must-offer obligation clarification.”

It is CPA’s understanding the two PRRs are related and seek to change the BPM requirements mainly for BESS resources that utilize the Off Grid Charging Indicator (OGCI). CPA recognizes the concern that CAISO is addressing with the language in PRR 1658 and the corresponding language around must offer obligations in 1659, however, these changes have wider potential market impacts and should be addressed in a stakeholder initiative process.

Particularly of note in PRR 1659 the language around what a SC could “reasonably foresee” at the time of the flexible RA supply plan submission is overly broad and could impact all resource types, not just co-located BESS. It isn’t clear to CPA what exactly the new requirement would be for supply plan submissions going into an RA month for an operator who is constantly managing fuel supply and potential maintenance targets for a given Flex RA resource. Additionally, the language seems to forgo any use or consideration of RAIM which is intended to address many of the unavailability issues for an RA resource.

In conclusion, while CPA understands the concerns CAISO is raising with these PRRs, CPA respectfully recommends the CAISO withdraw PRR 1658 and 1659. Instead, these issues should be addressed through a stakeholder initiative process that allows market participants to fully vet and understand the CAISO’s concerns.

C.C. Song
Csong@cleanpoweralliance.org
(213) 713-0363

C.C. Song
Senior Director, Regulatory Affairs

