

March 17, 2026

Submitted by Bonnie Blair on Behalf of the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California ("Six Cities")

INITIAL COMMENTS/QUESTIONS ON PRR 1667

The Six Cities have the following comments and questions concerning revisions included in the indicated sections for PRR 1667 - -

Re § 2.1.5, third paragraph - -

In the third line, change "follow" to "fall."

Please explain why the CAISO proposes to delete the last sentence of the paragraph?

Re § 2.4.1 and § 3.5 - -

In the second bullet, sequencing of the language suggests that there can be ISTs for Ancillary Services, Imbalance Reserves, and Reliability Capacity as well as Energy. However, the initial sentence of § 3.5 indicates that ISTs can be made for Energy, Ancillary Services and IFM Load Uplift in the CAISO balancing area and for Energy within WEIM and EDAM balancing areas, omitting any reference to ISTs for Imbalance Reserves and/or Reliability Capacity. The Six Cities request that the CAISO clarify and conform these sections or explain why the references to ISTs should be different in the two sections.

In the last paragraph of § 2.4.1, the Six Cities question whether there also should be a cross-reference to the bidding details for Imbalance Reserves. In the first line of that paragraph, change "describe" to "described."

Re § 7.1 - -

In the third paragraph, first bullet, change "express" to "expressed."

In the fourth paragraph, the Six Cities request additional explanation or clarification on two points. In the first line, the Six Cities suggest changing "may" to "will"; if "may is retained, indicating an option or decision point, the Six Cities request that the CAISO explain the criteria it will apply in deciding whether or not to insert a proxy bid. In addition, the Six Cities request that the CAISO explain how it will establish the price for a proxy RCU bid.

Re § 13.4.5 - -

Re the paragraph titled "GHG Import Transfers," what is the meaning of the term "GHG-driven import transfers"? Does it signify GHG resources committed to serve a particular GHG regulation area, or something else? The Six Cities request clarification.

Re the paragraph titled "EDAM BAA RSE Test," first line, should "IR" be "ID?"

Re § 13.4.6 - - Re the paragraph titled “Imbalance Reserve Surplus”, please provide further explanation for the concept of Imbalance Reserve Surplus and identify the section(s) in the CAISO tariff where it is discussed. Please also provide further explanation for the term “surplus zone node” and explain how and when surplus zones are defined.