

June 13, 2017

#### Continued Protest of PRR 986 by Joint DR Parties

On June 5<sup>th</sup>, the Joint DR Parties submitted a protest to PRR 986. On June 6<sup>th</sup>, at 7:57 AM, just prior to the stakeholder call, the CAISO published an agenda and materials for the stakeholder call that was to be held from 9 AM until noon. Parties were not given a reasonable period of time to review the materials that were made available prior to the call. Up until that time, the Joint DR Parties had been referred to PRR 914 as the support for PRR 986. The Joint DR Parties have expressed the concerns with reliance upon PRR 914 as support for PRR 986 in its comments on June 5<sup>th</sup>.

The call commenced with the CAISO presenting its material. Some questions were raised on the call, for which answers were not fully provided and other questions were not taken, when the call was abruptly ended by approximately 9:40 AM.

As to the content of the presentation itself, CAISO is basing its recommendation on the Flexible Assessment Study that CAISO presented to the CPUC on May 1 in the RA Proceeding (Docket R.14-10-010). CAISO did not make a proposal in the RA Proceeding to modify system and local RA AAH; however, CAISO did make a proposal to modify the Flexible RA AAH in R.14-10-010. The CPUC has issued a Proposed Decision that adopts the CAISO's recommendation in that proceeding.

While the Joint DR Parties appreciate CAISO identifying the source of its information that it purports supports the need to modify the RA AAH for local and system resources, the Joint DR Parties have not had adequate time to fully investigate the CAISO's information and analysis. In addition, the Joint DR Parties reference the comments submitted on June 5<sup>th</sup> again because most, if not all, of those concerns continue despite CAISO providing its support and holding a stakeholder call and additional comment period. Those concerns are the disruption to the DRAM participation in 2018 and DR program implications for 2018, the lack of following an established process of submitting RA criterion change proposals in RA proceedings before the CPUC, internally conflicting tariff statements and the appropriateness of this type of change in a BPM.