|  |  |  |
| --- | --- | --- |
| **Party** | **Comment** | **Response** |
| PG&E, SCE, Six Cities | There do not appear to be material differences between PRR 1122 and PRR 1074 | There are differences between the two PRRs but the ISO did not intend for PRR 1122 to be substantially different. |
| PG&E | The ISO should improve PRR 1122 to be more in line with the Tariff and more precisely focused on the “gaming” behavior that ought to be discouraged. | The PRR addresses activity that does not necessarily fall into the category of "gaming," "market manipulation," or similar such terms. The PRR addresses activity that can be operationally problematic and does not necessarily pose market impacts. That activity does, however, potentially involve both a tariff violation and violation of FERC prohibition against submitting false information to the ISO. A referral to FERC Enforcement is the proper way for an ISO/RTO to address such conduct. |
| PG&E | Broaden the list of appropriate reasons for resubmission--make clear the list is not exhaustive | That clarification has been made in revised proposed language. |
| PG&E, NCPA | ISO needs to make other improvements to outage management processes before pursuing these changes. | The ISO already has begun considering some of the recommended changes. Whether those changes are made is separate from whether it is appropriate for the ISO to bring tariff and market rule violations to FERC’s attention. |
| NCPA | The ISO does not appreciate the scheduling complications created by delaying outages -- referring to imminent failure is not sufficient to cover the concerns. | The scenario NCPA raises of delaying maintenance for a year is the type of scenario that the ISO intended to include in the “imminent failure” exception. The revised proposed language should make this point more clearly. |
| NCPA | "SCs submit planned outages in shorter term time frames . . . because there is an unforeseen issue that must be addressed immediately . . . . When CAISO rejects those requests because it cannot plan around the outage, and an SC cannot locate substitute capacity, the SC will have no choice but to resubmit the outage as a forced outage to prevent far greater harm in the future . . . ." | Absent further complicating factors, resubmission as a forced outage in this scenario likely would not be viewed as problematic. This is addressed in the revised proposed language. |
| NCPA, Six Cities | The CAISO’s proposed language has an implied premise that resubmitting a planned outage as a forced outage, on its own, is necessarily an indication of gaming or automatically illegitimate. | The ISO in this process never said that this conduct automatically would be considered illegitimate. |
| Six Cities | "The CAISO’s proposed language as quoted above is not simply a clarification of what the CAISO considered inappropriate behavior for reporting forced outages, but is a substantive change impacting the CAISO’s evaluation of outage requests." | The CAISO does not agree that it has proposed to alter a rate, term, or condition of service. |
| Calpine | Offers a rewritten draft of the language | The ISO has looked to incorporate some of this edited language in its revised proposed language |
| Calpine | Requests the ISO to commit that the ISO will cooperate with the resource owner to reschedule the outage to an agreeable period or reduce scope/duration of the outage. | The ISO already works with participants on exploring alternatives where the participants reached out for such assistance. |