

March 19, 2019

**COMMENTS OF THE CITIES OF ANAHEIM, AZUSA, BANNING,  
COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA  
ON PROPOSED REVISION REQUEST 1147**

In accordance with the Business Practice Manual (“BPM”) Change Management Process, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the “Six Cities”) provide their comments on Proposed Revision Request (“PRR”) 1147, titled “Conditionally available resources.” The CAISO states that the intent of the PRR is to add a new resource type called Conditionally Available Resources (“CAR”) in accordance with the Commitment Cost Enhancement phase 3 initiative.

Through PRR 1147, the CAISO proposes to add a new section regarding CARs to the Market Operations BPM. According to the CAISO’s revisions, the CAR designation will exempt a resource from bid generation if it provides Resource Adequacy (“RA”) capacity. However, the CAISO’s description of this exemption is not sufficiently clear and requires additional explanation from the CAISO. The second paragraph of Section 2.1.16 states as follows:

The CAR designation exempts a resource from bid generation if it provides RA capacity. CARs are not exempt from RAIM unless they separately qualify for a RAIM exemption. The bid generation exemption is provided because it is more feasible for both the resource and the CAISO to manage these limitations through a bid generation exemption than solely through the outage management process. If they so choose, however, a CAR may manage its limitations through outage cards submitted to the CAISO’s Outage Management System or a combination of outage cards and not bidding during times the resource is not available.

Based on the above language, the interplay between the bid generation exemption and the outage management process is not clear. The Six Cities request that the CAISO provide further explanation as to what the must offer obligation is for a CAR and the circumstances under which an outage notification is required if the CAR is satisfying its must offer obligation.

Submitted by,

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