

Comment	Party Making Comment	CAISO Response
PRR1280 will have harmful impacts that are inconsistent with state law and state policy.	CPUC; PG&E; SCE	The key outcome of PRR1280 is to ensure consistent treatment of all RA resources under the CAISO tariff and that resources counting towards meeting RA obligations be shown on RA supply plans. This outcome is neutral as to particular resource types and ensures consistent and non-discriminatory treatment among all resources providing RA capacity. In general, resources shown on RA supply plans face exposure to RAAIM non-availability charges if they cannot satisfy their RA capacity obligations. The CAISO acknowledges some resources may now face such exposure because of this PRR. The CAISO, however, does not agree that ensuring more even application of RAAIM across resources meeting RA obligations is an impermissible harmful impact.
PRR1280 intrudes on state jurisdiction and exceeds CAISO authority.	CPUC; PG&E; SCE	The PRR relates to aspects of the RA program that are within the CAISO's tariff authority. LRAs may set their planning reserve margin and establish qualifying capacity methodologies. Nothing about PRR1280 intrudes on LRAs' ability to exercise their authority on those matters.
PRR1280 exceeds Board authority from Slow Demand Response initiative.	CPUC; PG&E; SCE; SDG&E	Questions regarding LRA crediting were highlighted in the Slow Demand Response initiative but concerns on this matter cut across all aspects of RA. Further, the tariff amendments from that initiative are tied to financial settlement and accounting of slow demand response resources and do not speak to the crediting issue.
PRR1280 is not an appropriate change for a BPM.	CPUC	The key outcome of PRR1280 is to ensure consistent treatment of all RA resources under the CAISO tariff and that resources counting towards meeting RA obligations be shown on RA supply plans. This outcome is consistent with existing tariff and as such, the CAISO finds it is an appropriate BPM change.
PRR1280 is not necessary to achieve CAISO objectives.	SCE; PG&E	The CAISO respectfully disagrees. There is value to the CAISO in ensuring that resources counting towards meeting RA obligations are on RA supply plans. This ensures equal and non-discriminatory treatment of all RA resources under the CAISO tariff and ensures that all RA resources follow the CAISO tariff.
Which LSEs' adjustments get rejected? When?	SDG&E	If LRA credits do not net to zero, then all of the credits would be rejected. It would not be limited to a given LSE falling under the given LRA's jurisdiction.
How does this account for concern that load migration is not net neutral?	SDG&E	The CAISO has adjusted the PRR language to ensure that the revised BPM does not interfere with load migration processes or other aspects of setting LSE RA obligations.
What deficiency penalties would LSEs face?	SDG&E	The CAISO does not have RA deficiency penalties and PRR1280 does not propose to create any such penalties.
How does this relate to CPM designations for deficiencies?	SDG&E	Where the CAISO issues CPM designations for individual LSE deficiencies, then, per the tariff, the CAISO would allocate appropriate procurement costs to the deficient LSEs.
Do the concerns that motivate this PRR extend to liquidated damages contracts?	CPUC	The CAISO's concern extends across all credits that are used to meet RA obligations.
It does not seem appropriate that this PRR could go into effect even while a potential appeal is pending.	CPUC	The CAISO is following its established BPM change management process.