**NCPA Comments**

***PRR 1312 - Following trajectory between dispatch operating target***

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| **Submitted by**  | **Company** | **Date Submitted** |
| *Mike Whitney**916-781-4205**mike.whitney@ncpa.com* | *NCPA* | *2/16/2021* |

NCPA request that CAISO rephrase the proposed language to clarify that only resources that are required to follow Dispatch Instructions must follow Dispatch Operating Points. The following statements from the PRR are too broad and fail to recognize the unique characteristics and requirements of certain units (emphasis added): “As part of the requirement to respond to Dispatch Instructions, a resource must follow its DOP. This requirement applies to ***all resources***, including a Non-Generator Resource that is ramping from one DOT to the next”. An EIR cannot follow its DOP when it is not under Operating Instructions and is generating “as capable” as clouds roll by and the wind oscillates. Run of River resource types cannot follow Dispatch Instructions under any circumstance. More specific to NCPA, which is registered as Load Following Metered Subsystem, and as such is required to follow its load with its own resource in five-minute increments or be subject to severe penalties, Tariff section 34.14 explicitly exempts Load Following resources from following Dispatch Instructions due to the fact the capacity is reserved for addressing its own load variance: “Such MSS Load following resources can deviate from the Dispatch Instructions in Real Time to facilitate the following of Load”. NCPA respectfully requests CAISO to address these issues and limit the language to resource to which this requirement applies.