

**COMMENTS OF THE CITIES OF ANAHEIM, AZUSA, BANNING,
COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA
ON REVISED DRAFT TARIFF LANGUAGE FOR THE COMMITMENT COST AND
DEFAULT ENERGY BID ENHANCEMENTS INITIATIVE**

In response to the CAISO’s request, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the “Six Cities”) provide their comments on the revised draft tariff language for the Commitment Cost and Default Energy Bid Enhancements initiative posted on February 12, 2020:

- Section 30.4.4.4 In the CAISO’s filing with the FERC in Docket No. ER19-2727, the reference in the last line of this section was to Section 30.4.5.3. Section 30.4.5.3 appears to be the correct reference, as opposed to the reference in the current revised draft.
- Section 30.4.5.1 Language similar to that deleted from Section 30.4.5.1(b)(iv) remains in Sections 30.4.5.1(c)(v), 30.4.5.2(b)(iii), and 30.4.5.2(c)(v). It is not clear why there should be differences among these sections with respect to the language relating to major maintenance adders.
- Section 30.4.5.2 In the second line, delete “under the Proxy Cost” for improved clarity.
- In the first line of sub-section (c)(ii), delete “registered” for improved clarity.
- Section 30.4.5.4.2 Consistent with the filing in Docket No. ER19-2727 and with other sections in the revised draft, delete all ten (10) references to “or Independent Entity.”
- Section 30.4.5.4.3 Delete “or Independent Entity” from the first line.
- Section 30.4.5.4.4 Delete all three (3) references to “or Independent Entity.”
- Section 30.7.10.1(c) In the next to last line, insert “Minimum” after “applicable” for improved clarity and consistency.
- Section 30.11.2.1 With respect to the highlighted language added in the last sentence, although the CAISO’s deficiency letter response in Docket No. ER19-2727 proposed to add such language on compliance if so directed by FERC, there has been no such direction by FERC. FERC’s January 21, 2020 Order in Docket No. ER19-2727 expressly did not address “other issues raised in the comments” with respect to the CCDEBE proposal, including the Six Cities’ protest of CAISO’s proposal to disallow recovery of gas imbalance costs under any and all circumstances. 170 FERC ¶ 61,015 at P.39, n.45.

Section 30.12.1

With respect to the highlighted language added in the last sentence, although the CAISO’s deficiency letter response in Docket No. ER19-2727 proposed to add such language on compliance if so directed by FERC, there has been no such direction by FERC. FERC’s January 21, 2020 Order in Docket No. ER19-2727 expressly did not address “other issues raised in the comments” with respect to the CCDEBE proposal, including the Six Cities’ protest of CAISO’s proposal to disallow recovery of gas imbalance costs under any and all circumstances. 170 FERC ¶ 61,015 at P.39, n.45.

Appendix A - -
Definition of CAISO
Market Processes

The Six Cities have observed that the revised draft tariff language reverses numerous changes included in the filing in Docket No. ER19-2727 spelling out various acronyms. In general, the Six Cities do not object to such reversals. However, the definition of “CAISO Market Processes” included in the ER19-2727 filing is much more informative than a mere listing of the acronyms, and the Six Cities recommend use of the version of the definition submitted with the ER19-2727 filing.

Submitted by,

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