

# **Proxy Demand Response Resource Adequacy Clarifications Draft Tariff Language**

**Comments by Department of Market Monitoring**

**June 16, 2020**

- 1) DMM requests that the ISO explain the rationale is for creating the new settlement process outlined in the revised tariff language. The ISO already has a process for settling long-start resources which are committed to operate via exceptional dispatch after the day-ahead market and are instructed to generate above the units' minimum operating level (Pmin). For example, a resource can be issued an exceptional dispatch to its dispatchable Pmin (DPmin) after the day-ahead market and before real-time. Under current tariff provisions, these dispatches are settled based on real-time LMPs, real-time bids or default energy bids (DEBs).
- 2) DMM requests that the ISO clarify whether the ISO intends for the new tariff provisions to apply to all resource types or only long-start demand response resources. The proposed tariff language applies to "resources that receive an Exceptional Dispatch energy instruction prior to the Operating Day". This section could be read as applying to any type of resource which is exceptionally dispatched after the day-ahead market and before the operating day above Pmin. This includes exceptional dispatches to DPmin, which are often issued to gas resources.