

February 18, 2020

**COMMENTS OF THE CITIES OF ANAHEIM, AZUSA, BANNING,
COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA
ON THE DRAFT FINAL PROPOSAL IN THE COMMITMENT COST
ENHANCEMENTS TARIFF CLARIFICATIONS 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 Draft Final Proposal in the Commitment Cost Enhancements Tariff Clarifications stakeholder initiative posted on January 28, 2020.

As the Six Cities have expressed in previous comments in this initiative, the Cities do not agree with the CAISO's proposal to apply Resource Adequacy Availability Incentive Mechanism ("RAAIM") penalties to Conditionally Available Resources ("CARs"). Like Variable Energy Resources or run-of-river hydro resources, which are exempt from RAAIM penalties, the availability of CARs is dictated by conditions or restrictions that are outside the control of the resource owner or operator. The CAISO has not provided any logical reason to treat CARs differently, for purposes of RAAIM exemption, from other types of resources with similar uncontrollable limitations on availability.

Submitted by,

Bonnie Blair
Thompson Coburn LLP
1909 K Street N.W., Suite 600
Washington, D.C. 20006-1167
bblair@thompsoncoburn.com
202-585-6905

Attorney for the Cities of Anaheim, Azusa,
Banning, Colton, Pasadena, and Riverside,
California