

Tariff Section	Stakeholder	Comment	CAISO Response
N/A	DMM	<p>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</p>	<p>The CAISO's post day-ahead exceptional dispatches are commitment instructions eligible for bid cost recovery. There is no associated energy to settle for PMIN commitments. For resources that have a DPMIN above the PMIN, the associated real-time energy is subject to the mitigated energy settlement, which DMM describes. The mitigated energy settlement does not apply to demand response and it would be inconsistent with existing policy to go in this direction. Demand response does not have default energy bids and are not subject to mitigation. Applying DMM's proposed rule would result in Demand response earning the higher of the real-time LMP or the real-time bid. During the Slow Demand Response stakeholder process, the CAISO realized that the tariff did not provide rules for settling energy schedules issue in this post day-ahead time frame. And the CAISO also realized that it would be inappropriate to compensate them at the real-time bid after the Slow Demand Response provider receives an exceptional dispatch energy schedule. Accordingly, the CAISO is filing this tariff clarification for creating a rule that uses the day-ahead market bids in place of the real-time energy bids.</p>

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	DMM	<p>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.</p>	<p>Because the CAISO is filling a tariff gap identified during the Slow DR project implementation process, yes the CAISO proposes to apply this rule to any post-day ahead exceptional dispatch energy schedules. However, the vast majority of post-day ahead exceptional dispatches will continue to be commitment instructions, and the CAISO will continue to issue Exceptional Dispatches to DPmin under current practices and tariff rules.</p>