



## Response to Stakeholder Comments on Draft Tariff Language Commitment Costs and Default Energy Bid Enhancements (CCDEBE)

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
	Pacific Gas & Electric Company	Pacific Gas & Electric Company states that the CCDEBE Phase 1 initiative should only be filed at FERC in conjunction with the Import Bid Cost Verification initiative. Pacific Gas & Electric Company makes this suggestion to ensure consistency across the two initiatives and to ensure that energy bid caps are applied appropriately both in-state and at the interties.	The CAISO will delay implementation of Order No. 831 to provide additional time to develop cost verification screens for imports submitted at the interties for bids above \$1000/MWh.  However, the CAISO will proceed with submitting its compliance filing for the Order No.831 requirements concurrent with the CCDEBE tariff.
	Pacific Gas & Electric Company	Pacific Gas & Electric Company requests that the ISO remove the CCDEBE Phase 2 items from the draft tariff language and to differentiate non-CCDEBE related changes. Pacific Gas & Electric Company states that it is particularly confused by whether reference level changes for Default Commitment Costs (Default Start-Up Bids, Default Minimum Load Bids, and Default Transition Bids) are included in Phase 1 or if they have been postponed to Phase 2 (along with market power mitigation). Pacific Gas & Electric Company comments that the recent Business Requirements Specification seems to suggest that Phase 1 only addresses Default Energy Bids.	Phase 2 items are not in this draft tariff language.  The reference level changes are in Phase 1, which is why they appear in this draft tariff.  We will verify the BRS and ensure it correctly captures that the Phase 1 items.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
	The Six Cities <sup>1</sup>	<p>The Six Cities comments that throughout the draft tariff language there appears to be inconsistencies in the terminology used to specify Start-Up Bid <i>versus</i> Start-Up Costs, Minimum Load Bid Costs <i>versus</i> Minimum Load Costs, etc. The Six Cities states that for example, in the draft tariff language for Section 11.8.3.1, why is “Bid” inserted in lines 5 and 6 but not in lines 1, 2 and 3? The Six Cities states that it would be helpful to have an explanation for the principles the ISO applied in determining whether or not to insert “Bid” in a reference to Start-Up Costs or other types of Commitment Costs to facilitate a review for consistency of terminology.</p>	<p>The ISO attempted to clarify the use of these terms to ensure we are referring to the correct inputs.</p> <p>The tariff already makes references Start-Up Bids and Start-up Costs, Minimum Load Bids and Minimum Load Costs, etc... but seems to use the terms interchangeably.</p> <p>Using minimum load costs as an example, the Minimum Load Bids are bids for Minimum Load Costs submitted by the scheduling coordinator in the format defined by the tariff. The term “Minimum Load Costs” defines the costs that can be included in a Minimum Load Bid.” Minimum Load Bids can be up to the Default Minimum Load Bids calculated by the ISO based on the resource’s proxy or registered costs. The term Default Minimum Load Bid is a new term and it is incorporated in this first phase as a cap to how high the Minimum Load Bids can be. Default Start-Up Bids, Default Transition Bids and Default Minimum Load Bids are Default Commitment Costs, similar to Default Energy Bids that will be used for purposes of mitigation in Phase 2. In Phase 1, they serve as caps to how</p>

<sup>1</sup> The Six Cities consists of the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California.



# California ISO

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			<p>much can be bid-in.</p> <p>Minimum Load Costs are the actual costs that the ISO calculates or are submitted as part of the Minimum Load Bid. Because the Minimum Load Costs submitted as part of a Minimum Load Bid can be modified based on the rules specified in the tariff, the actual costs the ISO uses to clear in the market may be different than what is submitted. They may turn out to be the Default Minimum Load Bid if the resource bids above that amount. Also, Default Minimum Load Bids can be increased through Reference Level Change Requests or changes the ISO makes to the Reference Levels on its own initiatives.</p> <p>Minimum Load Bid Costs are the costs the ISO will use for purposes of calculating the bid cost recovery, which may be different than what was submitted because of all the reasons specified in the tariff.</p> <p>This same logic applies to Start-Up Costs, Start-Up Bids, Start-Up Bid Costs, and Default Start-Up Bids; and Transition Bids, Transition Costs, and Default Transition Bids.</p>



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
4.12.1.1  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company questions if the changes in section 4.12.1.1 are related to CCDEBE or if it is a cleanup change.	These changes are clarifications and also introducing the use of the term Default Start-Up Bids and Default Minimum Load Bids, which as described above are new terms used to reference the cost-based commitment costs calculated by the ISO.
6.5.2.2.3  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company requests to know the context of the changes to section 6.5.2.2.3.	As part of CCDEBE, the ISO is making permanent the measure adopted in the Aliso Canyon emergency filings in which the ISO provides stakeholders advisory schedules ahead of the day-ahead market. This was a temporary measure and will now be added as a permanent feature of the ISO tariff.
6.5.2.2.3  (CCDEBE Language)	The Six Cities	The Six Cities proposes the following edits: “The CAISO <del>may</del> <u>will</u> provide to the responsible Scheduling Coordinator its resource’s hourly Energy schedules provided in the non-financially binding RUC process the CAISO conducts...”	As a general course of business the ISO intends to provide these advisory schedules. However, it is sometimes not feasible to do so and the ISO wants to continue to have the flexibility to not provide them if it becomes impractical to do so. Therefore, having the flexibility is preferable.
11.5.6.2.5.2	Pacific Gas & Electric Company	Pacific Gas & Electric Company requests that the ISO elaborate on the meaning of ISO approval consistent with sections 30.7.12 and 30.11.	Section 30.7.12 and 30.11 have provisions that govern what actual Energy Bids will be used in for settlement of the Excess Costs as they be subject to mitigation and bids used in mitigation may be modified as specified in those sections.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
			This change is related to Order No. 831 compliance. Compliance with No. 831 is scheduled for Fall 2020 and not concurrent with CCDEBE Phase 1 changes, which will go in Fall 2019.
11.8  (CCDEBE Language)	The Six Cities	The Six Cities proposes the following edits: “Scheduling Coordinators for Non-Generator Resources are not eligible to recover Start-Up Bid Costs, Minimum Bid Load Bid Costs, Pumping Costs, Pump Shut-Down Costs, or Transition Bid Costs but are eligible to recover Energy Bid Costs, RUC Availability Payments and Ancillary Service Bid Costs.”  See Six Cities comment above.	The ISO will make this edit.
11.8.1.3  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company comments that start-up costs, minimum load costs, and transition costs are subject to bid insertion and should also get bid cost recovery. Pacific Gas & Electric Company further comments that it should apply to all sections that contain bid cost recovery.	This is existing logic in the tariff and functionality. This policy or tariff filing makes no changes to these rules.  The changes proposed in this section consist only of editorial and terminology updates.
11.8.2.1.1(e)  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company comments that the capitalization of “Off” and “On” implies that they are defined terms in the tariff. Pacific Gas & Electric Company requests to know if this was the intent.	It is intentional and they are defined in Appendix A to the ISO tariff.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
11.8.4.1.2  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company proposes the following edits to change Minimum Load Bids to Minimum Load Bid Costs:  “...RTM Minimum Load Costs will include negative Minimum Load Cost <u>Bids</u> for Energy between...”	This change is included.
11.8.4.3.2  (CCDEBE Language)	The Six Cities	The Six Cities proposes the following edits:  “...the algebraic sum of the RUC Bid Cost Shortfall or RUC Bid Cost Surplus and RTM Bid Cost Shortfall or RTM Bid Cost Surplus for Energy and the RUC Bid Cost Shortfall or RUC Bid Cost Surplus and RTM Bid Cost Shortfall or <u>RTM Bid Cost</u> Surplus <u>for</u> AS for each Settlement Interval.”	The ISO will make this change. The ISO proposes one additional change as follows:  “...and RTM Bid Cost Shortfall or RTM Bid Cost Surplus for <u>Ancillary Service</u> for each Settlement Interval.”
27.4.3.1  (Order No. 831 Compliance Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company requests that the ISO explain the relationship between the \$2,000/MWh hard cap and the prices for the Intertie Transmission Constraint.	The ISO is continuing to consider this comment.  The ISO will commence a stakeholder process to consider these changes further. These changes are related to compliance with FERC Order No. 831 and not with CCDEBE policy per se. Because we are delaying implementation of Order No. 831, this change will not be part of this Section 205 filing and any changes resulting from the upcoming stakeholder process will be filed in a separate Section 205 filing.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
27.4.3.2 and 27.4.3.4  (Order No. 831 Compliance Language)	Joint EIM Entities <sup>2</sup>	<p>The Joint EIM Entities request that the ISO withdraw this proposal and investigate the use of stepped parameters below the \$1,000/MWh level. The Joint EIM Entities comment that raising the power balance constraint parameter penalty price above \$1,000/MWh will produce unjust and unreasonable prices in almost all, if not all instances, when the constraint is triggered.</p> <p>The Joint EIM Entities question why the ISO is proposing to use a \$2,000/MWh as the power balance constraint parameter penalty price in all hours and omit the cost-based justification as required by Order No. 831.</p>	See response above.
27.4.3.6  (CCDEBE Language)	NRG Energy, Inc.	<p>NRG Energy, Inc. proposes the following edits:</p> <p>“The CAISO Markets software includes a lower effectiveness threshold setting that governs whether the software will consider a bid “effective” for managing congestion on a congested Transmission Constraint, which in the case of Nomograms will be applied to the individual flowgates that make up the Nomogram, rather than to the <del>final</del> Nomogram itself.”</p>	The ISO will make this change.

<sup>2</sup> The Joint EIM Entities are Arizona Public Service Company, Idaho Power Company, PacifiCorp, NV Energy, and Portland General Electric.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
27.4.3.6  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company questions what “applied to individual flowgates” means in this context.	Each nomogram is made up of individual flowgates. The effectiveness threshold is applied to each of the flowgates rather than the whole nomogram.
30.4.1(a)  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company questions what the default commitment cost is Non-Resource-Specific and Non-Generating Resources.	The ISO does not calculate default commitment costs for these resources.
30.4.1(b)  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. questions if the cross reference of section 30.4.6 is correct. NRG suggests that the cross reference should be section 30.4.7.	The ISO has corrected this cross-reference.
30.4.1(b)  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company questions if the changes in this section are a result of a cleanup from the commitment cost enhancements phase 3 initiative.	These are clarifying changes to help organize this section better and add what is needed with CCDEBE. Some of the changes are clarifying what was added in CCE3.
30.4.3  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company asks if this change is related to CCDEBE Phase 2.	No. This is part of Phase 1. It is important to note in this section that Default Start-Up Bids and Default Minimum Load Bids can be modified per Section 30.11.





# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.4.4  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company asks if this change is related to CCDEBE Phase 2.	No, it is part of Phase 1. This change helps organize this section and describes how Default Commitments Costs are now calculated. Consequently, putting this change in now helps in setting the framework for Phase 2.
30.4.4.1  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. proposes the followed edits:  “For resources under the Proxy Cost methodology, the CAISO will calculate a resource’s Default Commitment Cost Bids as <u>the</u> applicable Proxy Cost multiplied by one hundred and twenty-five percent (125%).”	The ISO will make this change.
30.4.4.2  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. comments that the term “Use Limited Resources” should be hyphenated as “Use-Limited Resources,” as the defined term is “Use-Limited Resources.”	The ISO will make this change.
30.4.4.2  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company requests that the ISO include Transition Cost and proposes the following edits:  “For Use Limited Resources using the Proxy Cost methodology, the CAISO will calculate a resource’s Default Commitment Cost Bids as the applicable Proxy Cost multiplied by one hundred twenty-five percent (125%) plus the Opportunity Start-Up Cost or	The ISO will add a new defined term: Transition Opportunity Costs.  Also the ISO will change the references to “Opportunity Start-Up Cost or Opportunity Minimum Load Cost” to say “Start-Up Opportunity cost or Minimum Load Opportunity Cost”  The ISO will add Transition Opportunity



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
		<p>Opportunity Minimum Load Cost or <u>Transition Cost</u> as applicable.”</p> <p>Pacific Gas &amp; Electric Company comments that the Transition Cost should be included because of the definition of the Proxy Cost methodology pursuant to section 30.4.1.5(d)</p>	<p>Costs to this section.</p> <p>Transition Opportunity Costs will be defined to say that in cases where a transition between configurations is considered a start to which the limitation applies, a Transition Opportunity Cost will be calculated for each feasible transition as the Start-Up opportunity cost of the to-configuration multiplied by the number of starts registered in the Masterfile to achieve the transition.</p>
<p>30.4.4.3</p> <p>(CCDEBE Language)</p>	NRG Energy, Inc.	NRG Energy, Inc. comments that the term “Use Limited Resources” should be hyphenated as “Use-Limited Resources,” as the defined term is “Use-Limited Resources.”	The ISO will make this change.
<p>30.4.4.3</p> <p>(CCDEBE Language)</p>	Pacific Gas & Electric Company	Pacific Gas & Electric Company asks if the changes in this section are cleanup changes related to the Commitment Cost Enhancements Phase 3 initiative.	This is related to CCDEBE and just specifies how the Default Commitment Costs for those under Registered Costs are calculated. However, it is based on existing logic for registered costs and does not change any existing rules.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.4.4.4  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. suggests the following edits:  “In the event that the Scheduling Coordinator for a resource other than a Multi-Stage Generating Resource or for a Multi-Stage Generating Resource in its lowest configuration in which <del>case</del> it can be started does not provide sufficient data for the CAISO to determine...”	The ISO will make this change.
30.4.4.4  (CCDEBE Language)	The Six Cities	The Six Cities proposes the following edits:  “...for a Multi-Stage Generating Resource in its lowest configuration in which <del>case</del> it can be started does not provide sufficient data for the CAISO to determine...”	The ISO will make this change, see response above.
30.4.4.6  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. proposes the following edits:  “In no <del>cases</del> shall the Default Minimum Load Bid exceed the Minimum Load Cost Hard Cap.”	The ISO will make this change.
30.4.4.6  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company asks if the changes in this section are related to CCDEBE Phase 2.	No, these are part of Phase 1.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.4.5.1(d)  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. suggests the following edits:  “...MSG Configuration to a higher MSG Configuration based on the difference between the Proxy Start-Up Costs for the higher MSG Configuration, <del>and minus</del> the Proxy Start-Up Costs for the lower MSG Configuration, as <u>those costs are</u> determined in accordance with the Proxy Start-Up Cost calculation methodology set forth...”	The ISO will make this change.
30.4.5.2(d)  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. suggests the following edits:  “...Proxy Start-Up Costs for the higher MSG Configuration, <del>and minus</del> the Proxy Start-Up Costs for the lower MSG Configuration, as <u>those costs are</u> determined in accordance with the Proxy Start-Up Cost calculation methodology set forth...”	The ISO will make this change.
30.4.6.2.2(2)-(3)  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. comments that including both “power” and “electric” seems unnecessary. NRG Energy, Inc. further comments that if a change is being made to section 30.4.6.2.2(3) should also be made to section 30.4.6.2.2(d).	The ISO will remove references to “power.”  The ISO will also change references to “power trading hub” in subpart (2) of this section to “electric pricing hub.”



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.7.3.1  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company requests that the ISO elaborate on the ISO either extending the Energy Bid Curve or using the Generated Bid to cover any capacity in a RUC Bid component.	This initiative does not change this existing rule. The ISO will clarify the language.
30.7.3.4  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. proposes the following edits:  “The Scheduling Coordinator may view Generated Bids, but may not modify such Bids, <del>except if</del> <u>unless</u> the CAISO has approved a Reference Level Change Request for the resource’s Default Energy Bid. “	The ISO will make this change.
30.7.3.4  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company requests that the ISO provide more clarification on Default Energy Bid reference level change requests in this section. Pacific Gas & Electric Company comments that as the language is currently written, generated bid components after market close is unclear. Pacific Gas & Electric Company questions how will Scheduling Coordinators be able to view Default Energy Bids before bids are due in order to know whether to request a reference level adjustment. Pacific Gas & Electric Company also requests to know where the information would be posted.	The intent of this addition was to note that scheduling coordinators cannot request a change to their Generated Bid. However, if they request a change to their Default Energy Bid and the change is accepted, it will result in a change in the Generated Bid. The CAISO will clarify this section accordingly.  See note below regarding where and how scheduling coordinators see their default energy bids.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.7.3.4  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company questions when Scheduling Coordinators may view Generated Bids, but not modify the bids would apply. Pacific Gas & Electric Company asks if it would apply when a Scheduling Coordinator has submitted a Default Energy Bid reference level change but not the bids themselves. Pacific Gas & Electric Company asks for clarification if Scheduling Coordinators will be able to view the generated bids and then request a change.	See above response.
30.7.9  (CCDEBE Language)	Southern California Edison Company	Southern California Edison Company proposes removing 30.7.9(h) as it is redundant because it is covered in 30.7.9(d)	The ISO agrees to consolidate these two sections.
30.7.9(d) and 30.7.9(h)  (CCDEBE Language)	The Six Cities	The Six Cities comments that the substance of the new subsection largely duplicates the substance of section 30.7.9(h). The Six Cities suggests that the section 30.7.9(d) and section 30.7.9(h) be combined.	Agreed, see above response.
30.7.10.1  (CCDEBE Language)	The Six Cities	The Six Cities proposes the following edits: “...or a Resource-Specific System Resource, Participating Load, Reliability Demand Response Resource, <u>or</u> Proxy Demand Resource, expressed in...”	The ISO will make this change.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.7.10.3  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company questions why this section is being removed.	This section is covered by language in the prior section, which obviate the need for its own separate section.
30.7.11(b)  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. suggests the following edits:  “For resources under the Proxy Cost methodology, Transition Bids must be less than or equal to the Default Transition Bids calculated under <u>the</u> Proxy Cost methodology.”	The ISO will make this change.
30.7.11(c)  (CCDEBE Language)	The Six Cities	The Six Cities suggests the following edits:  “...the Registered Costs method Transition <del>s</del> Bids must equal...”	The ISO will make this change.
30.7.11(c)  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. suggests the following edits to make it parallel to section 30.7.11(b):  “For resources under the Registered Costs method <u>ology</u> .”	The ISO will make this change.
30.7.12.1  (Order No. 831 Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company comments that it disagrees and refers the ISO to its comments submitted on the Import Bid Cost Verification initiative.	The ISO is addressing cost validation of Non-Resource-Specific System Resource bids in a separate filing.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.7.12.4  (Order No. 831 Language)	NRG Energy, Inc.	NRG Energy, Inc. proposes the following edits:  “For any Energy Bid or Minimum Load Bid price submitted above the Energy Bid price for the Minimum Load Bid the CAISO uses in the CAISO Market Processes, the Scheduling Coordinator may be eligible for after-market cost recovery pursuant to Section 30.12.”	The ISO will make this change as part of its Order No. 831 compliance filing.
30.7.12.4  (Order No. 831 Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company requested clarification if the word used should be “recovery” as opposed to “recover.”	See the ISO’s response above.
30.7.12.4	Pacific Gas & Electric Company	Pacific Gas & Electric Company states that the language in this section is not clear and requests clarification.	See comment above. PG&E should clarify what is not still clear.
30.7.12.4  (Order No. 831 Language)	The Six Cities	The Six Cities proposes the following edits:  “...the Energy Bid price for the Minimum Load Bid <u>price</u> the CAISO uses in the CAISO Market Processes...”	The ISO will make this change.
30.7.12.5  (Order No. 831 Language)	NRG Energy, Inc.	NRG Energy, Inc. questions if the ISO will be rejecting prices or bids and requests clarification.	The ISO will reject Bids. The ISO will clarify that section as part of its Order No. 831 compliance filing.





# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.7.12.5  (Order No. 831 Language)	The Six Cities	The Six Cities proposes the following edits: <b>“Virtual Bids and <u>Bids for Non-Resources-Specific System Resources</u>”</b> The CAISO will reject Virtual Bid prices <u>and Bids</u> for Non-Resource-Specific System Resources that exceed the Hard Energy Bid Cap.”	The ISO will make this change as part of its Order No. 831 compliance filing
30.11  (CCDEBE Language)	The Six Cities	The Six Cities suggests the following edits: <b>“<u>Pre-CAISO Market Processes Adjustments to Reference Levels Prior to CAISO Market Processes</u>”</b>	The ISO will make this change.
30.11.1  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. proposes the following edits: “The CAISO will calculate <del>d</del> Reasonableness Thresholds for the purpose of evaluating increases to Reference Levels pursuant to this Section 30.11.1.”	The ISO will make this change.
30.11.1  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company notes that there is a grammatical error, it should be “calculate” as opposed to “calculated.”	See the ISO’s response above.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.11.1 (CCDEBE Language)	The Six Cities	The Six Cities proposes the following edits: <b>“Reasonableness Thresholds</b> The CAISO will calculate Reasonableness Thresholds for the purpose of evaluating increases to Reference Levels pursuant to this Section 30.11.1.”	The ISO will make this change, and see response above.
30.11.1.1 (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. proposes the following grammatical edits: “In no case will the Reasonableness Thresholds be lower than the resources’ Default Commitment Cost Bids or Default Energy Bids that were established prior to the submission of the Reference Level Change Request.”	The ISO will make some of these changes. The ISO proposes insert “a” before “resource’s Default Commitment Cost Bids...”
30.11.1.1 (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company refers the ISO to its comments submitted in the Import Cost Verification Initiative.	The ISO is dealing with cost verification rules for interties in a separate tariff amendment.
30.11.1.1 (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company states that the sentence does not make sense and questions why section 30.11.1.2.2 for non-natural gas-fired would not apply.	Which sentence is PG&E referring to? Section 30.11.1.2.2 does apply to non-natural gas-fired resources. Not sure what PG&E’s comment means.
30.11.1.1 (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company asks what the minimum criteria is for non-resource-specific imports.	Non-Resource-Specific System Resources are resources not registered as Resource-Specific System Resources. At a minimum, they do not identify a specific generator and the ISO does not receive telemetry.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.11.1.1  (Order No. 831 Language)	The Six Cities	The Six Cities asks why would there be any need for a reasonableness threshold if the ISO does not calculate a Default Energy Bid.	The ISO will not allow resources without default energy bids to request verification of bids above \$1,000/MWh, because the ISO does not have a basis to verify the costs. However, they are eligible for ex-post verification. The ISO will create a reasonableness threshold for these resources in order to provide them the opportunity for ex-post verification. Therefore, if these resources expect the need to submit a bid above \$1,000/MWh, they should submit a reference level change request, which will be rejected, but will make them eligible for ex-post recovery.
30.11.1.2.1  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. proposes the following grammatical edits:  “For natural gas-fired resource <u>s</u> , the CAISO will calculate the Reasonableness Threshold to equal the...”	The ISO will make this change.
30.11.1.2.1  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company comments that in the last sentence a verb is missing.	The ISO will add the term “use” before “one hundred and ten percent.”



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.11.1.2.1  (CCDEBE Language)	Southern California Edison Company	Southern California Edison Company proposes the following edits:  “For a natural gas-fired resource, the CAISO will calculate the Reasonableness Threshold to equal the Proxy Cost based on Default Start-Up Bid, Proxy Cost-based Default Minimum Load Bid, or the Variable Cost-based Default Energy Bid calculated for the specific resource, where the natural gas commodity price component determined pursuant to Section 39.7.1.1.1.3 is multiplied by: (i) one hundred twenty-five percent (125%) for days without a published daily gas price index consistent with the rules in Section 39.7.1.1.1.3, unless the CAISO has updated natural gas commodity price used to calculate the Reasonableness Threshold pursuant to Section 30.11.1.3, in which case the CAISO will <u>use</u> one hundred ten percent (110%); <del>or (ii) one hundred ten percent (110%) for all other days.</del> ”	The ISO agrees to make these changes.
30.11.1.2.1  (CCDEBE Language)	The Six Cities	The Six Cities proposes the following edits:  “...unless the CAISO has updated <u>the</u> natural gas commodity prices used to calculate the Reasonableness Threshold pursuant to Section 30.11.1.3, in which case the CAISO will <u>multiply by</u> one hundred ten...”	The ISO will add the word “the” before natural. For the rest of the changes, see above.



Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.11.1.3  (CCDEBE Language)	NRG Energy, Inc.	<p>NRG Energy, Inc. proposes the following edits:</p> <p>“...Reference Levels Change Requests applicable for each commodity gas region, to determine whether the same-day gas prices are <del>greater than</del> <u>greater than relative to</u> the gas price index the CAISO previously used to calculate the Reasonableness Thresholds. If the CAISO determines representative same-day gas prices are <del>greater than</del> <u>greater than compared to</u> the index the CAISO previously used to calculate the Reasonableness Thresholds...”</p> <p>“Any updates the CAISO makes to Reasonableness Thresholds <del>throughout</del> this process will apply to the Real-Time Market throughout the remainder of the Trading Day.”</p>	The ISO will accept these changes.
30.11.1.3  (CCDEBE Language)	The Six Cities	<p>The Six Cities proposes the following edits:</p> <p>“...to determine whether the same-day gas prices are greater than ten percent (10%) <del>relative to above</del> the gas price index the CAISO previously used to calculate the Reasonableness Thresholds. If the CAISO determines representative same-day gas prices are greater than ten percent (10%) <del>as compared to above</del> the index the CAISO previously used to calculate...”</p>	The ISO will accept NRG’s proposed changes to this section, which provide a similar clarification.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.11.1.4  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. proposes the following edits:  "...observed by the CAISO in the after-CAISO Market Processes review pursuant to Section 30.12, are systematically greater than the gas price indices or..."	The ISO will make this change.
30.11.1.4  (CCDEBE Language)	The Six Cities	The Six Cities comments that this section requires more specificity. The Six Cities questions how long must "greater than" prices persist. Six Cities also questions how much greater must the prices be – more than one hundred ten percent (110%). Additionally, Six Cities asks how long does such an adjustment remain in effect.	The ISO will provide examples of how certain conditions would warrant this provision through the Business Practice Manual process. The ISO expects that there will be circumstances when a supplier's costs are higher than their calculated reasonableness threshold. This would include a Scheduling Coordinator submitting numerous change requests that are above their calculated reasonableness threshold. During the after-the-fact evaluation of those requests, the ISO determined the Scheduling Coordinator's requests were indeed actual costs. Therefore, the ISO would adjust the supplier's reasonableness threshold to accommodate the supplier's higher costs.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.11.2.1  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. questions what is applicable, or what is being added, in this section.	This section specifies what type of resources and Default Commitment Costs and Default Energy Bids can ask for Reference Level Change Requests.
30.11.2.1  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company comments that the submission of a reference level change request should change with the Import Bid Cost Verification initiative. Pacific Gas & Electric Company recommends that the ISO wait to make this tariff change.	The ISO will consider changes related to the Import Bid Cost Verification initiative in a subsequent filing.
30.11.2.1  (CCDEBE Language)	The Six Cities	The Six Cities proposes the following edits: “...Default Start-Up Bids, Default Minimum Load Bids, Default Energy Bids, <u>and</u> as applicable.”	The ISO will clarify this section as follows:  A Scheduling Coordinator may submit a Reference Level Change Request for <del>all resources, except for Non-Resource-Specific System Resources</del> , for Default Start-Up Bids, Default Minimum Load Bids, <u>and</u> Default Energy Bids, as applicable. <u>Scheduling Coordinators may not submit Reference Level Change Requests for Bids by Non-Resource-Specific System Resources.</u>



Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.11.2.2  (CCDEBE Language)	Joint EIM Entities	The Joint EIM Entities comment that the CAISO states that a reference level adjustment must be supported by Documentation of Contemporaneously Available Information. The Joint EIM Entities comment that the statement does not provide enough information about the types of documents or supporting information that would be suitable to the ISO when submitting a reference level adjustment. The Joint EIM Entities request that the ISO provide more detail or examples about the type of documentation that would be deemed suitable for a reference level adjustment.	The definition for Documentation of Contemporaneously Available Information provides additional detail on what types of documents and information the ISO finds acceptable. The ISO will provide additional specific examples in the business practice manuals consistent with these requirements.
30.11.2.2  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. proposes the following edits:  “Scheduling Coordinators must calculate their Reference Level Change Requests amounts consistent with <u>the</u> methodology used to calculate the Proxy Cost based Default Start-Up Bid and Default Minimum Load Bid, and the Variable Cost based Default Energy Bid <u>calculated</u> . All Reference Level Change Requests must be based on the Scheduling Coordinator’s reasonable expectation that its <u>daily</u> actual fuel cost or fuel-equivalent costs for a given Trading Day will exceed the costs used by	The ISO agrees to make the first two changes. However, the reference to <i>daily</i> actual fuel costs must remain.





# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
		the CAISO to calculate the resource's Reference Levels, and must reflect reasonable and prudent procurement practices."	
30.11.2.2  (CCDEBE Language)	The Six Cities	The Six Cities proposes the following edits: "Scheduling Coordinators must calculate their Reference Level Change Requests amounts consistent with <u>the</u> methodology used to calculate the Proxy Cost based Default Start-Up Bid and Default Minimum Load Bid, and the Variable Cost based Default Energy Bid <del>calculated</del> ."	See the ISO's above response.
30.11.2.3  (Order No. 831 Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company comments that this language implies that the market participants know what the Default Energy Bid is, and questions as to where and how the ISO will publish this information.	Default Energy Bids for the Real-Time Market are currently published on CMRI and the Fuel Prices from which they are calculated can currently be found on OASIS. This will not change with the implementation of CCDEBE. The calculation methods of Default Energy Bids can be found in Attachment D of the Market Instruments BPM. The CCDEBE functionality allows market participants to reflect changes in gas prices with the ability to submit a reference level change request for Default Energy Bids based on actual or expected gas prices.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.11.3.1  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. requests that the ISO define the term “Automated Reference Level Change Request.”	The ISO believes the term automated is self-explanatory.
30.11.3.1  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. questions if the following language is required as the requirements are imposed on Reference Level Change Requests in section 30.11.2.2:  “The Scheduling Coordinator must not submit a Reference Level Change Request for the purpose of strategically bidding near the Reasonableness Threshold to bid above actual or expected costs.”	The ISO believes this is necessary as it puts the scheduling coordinator on notice.
30.11.3.1  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. proposes the following edits:  “The CAISO shall not <del>accepted</del> automated Reference Level Change Requests for Hydro Default Energy Bids.”	The ISO will make this change.
30.11.3.1  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company requests that the ISO tie the last sentence of this section back to the policy language. Pacific Gas & Electric Company also notes that there is a grammatical error.	See the ISO’s above response.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.11.3.2  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. proposes the following edits to be consistent with section 30.11.3.4(a):  “The CAISO may request the <u>Scheduling Coordinator to provide the CAISO with Documentation of Contemporaneously Available Information pursuant to Section 30.11.3.4.</u> ”	The ISO will make this change.
30.11.3.4(a)  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. comments that the phrase “...may request the Documentation of Contemporaneously Available Information” as being duplicative language in section 30.11.3.4.	The ISO does not agree the language is duplicative because the ISO may need to conduct a further audit than just the documentation; or it may also just need the documentation. Therefore the tariff should reflect both instances for clarification purposes.
30.11.3.4(a)  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. proposes the following suggested edits:  “...the Scheduling Coordinator may request <del>for</del> CAISO <u>ADR Procedures Dispute Resolution</u> as specified in Section 13 of the CAISO Tariff within five (5) Business Days. If the Scheduling Coordinator requests <del>for</del> CAISO ADR Procedures, the penalties specified...	The ISO will make this change.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.11.3.4(a)  (CCDEBE Language)	The Six Cities	<p>The Six Cities proposes the following edits:</p> <p>“...the Scheduling Coordinator may request <del>for</del> CAISO Dispute Resolution as specified in Section 13 of the CAISO Tariff within five (5) Business Days. If the Scheduling Coordinator requests <del>for</del> CAISO ADR Procedures, the penalties specified in subpart (b) of this section will apply until the resolution of the CAISO ADR. <del>Any further change in determination of non-compliance after</del> <u>If the CAISO ADR Procedures <a href="#">confirm that the Documentation of Contemporaneously Available Information did not support the Scheduling Coordinator’s automated Reference Level Change Request, the penalties specified in subpart (b) of this section are complete</a></u> will apply prospectively from the date the CAISO Procedures decision is finalized.”</p>	<p>The ISO will make some of these changes. See the ISO’s edits in the Revised Draft Tariff Language.</p>
30.11.3.4(b)(1)  (CCDEBE Language)	NRG Energy, Inc.	<p>NRG Energy, Inc. proposes the following edits:</p> <p><del>“The determination of non-compliance will result in t</del>The CAISO <del>shall</del> prohibiting the Scheduling Coordinator from making any Reference Level Change Requests for sixty (60) days from the time the CAISO informs the Scheduling Coordinator of the non-compliance.”</p>	<p>The ISO will make these changes.</p>



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.11.3.4(b)(1)  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. comments that the ISO uses the term “non-compliance” to describe the situation in which the ISO determined that the submitted documentation does not support the proposed reference level adjustment. NRG Energy, Inc. questions if “non-compliance” is the correct phrase to use in this situation.	See the ISO’s above response.
30.11.3.4(b)(1)  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. questions if the ISO has an obligation to notify the Scheduling Coordinator within a defined period of time. NRG Energy, Inc. suggests that if the ISO does not, that the ISO could move the period during which it will not accept any reference level change requests from a time when gas prices are not volatile to one in which they are.	The ISO will not propose further changes to this section. The ISO will process the audits as quickly as possible and will impose the penalty once the determination is made.
30.11.3.4(b)  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company comments that the penalties are not meaningful <u>for</u> imports if there is not a reference level.	The penalties relate to reference level adjustment requests and are not applicable to imports as they are not subject to the soft cap and do not have DEBs because the market does not mitigate import bids as part of the local market power mitigation process
30.11.3.4(b)(2)  (CCDEBE Language)	The Six Cities	The Six Cities suggests the following edits:  “...from the time the CAISO informs the Scheduling Coordinator of the <u>subsequent</u> non-compliance.”	See the ISO’s above response.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.11.4.1  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. requests that the ISO clearly define what the automated reference level change requests and the manual reference level change requests are.	See the ISO's above response. The CAISO believes the terms automated and manual are self-explanatory.
30.11.4.1(b)  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company asks what is driving the different treatment of Default Energy Bids for non-natural gas-fired resources. Pacific Gas & Electric Company also asks if there an actual policy needed.	The ISO calculates default bids for non-natural gas-fired resources differently than natural gas-fired resources. Therefore, there is a need to have different rules for both resources.
30.11.4.2  (CCDEBE Language)	The Six Cities	The Six Cities proposes the following edits:  “...manual Reference Level Change Request when <del>its</del> actual or expected fuel cost or fuel-equivalent cost exceeds the fuel or...”	The ISO accepts these changes in part.
30.11.4.2  (CCDEBE Language)	The Six Cities	The Six Cities asks if the time deadline makes sense in light of availability of gas price information. Six Cities further asks if it is necessary to have a time cut-off for manual Reference Level Change Requests, or if it would be feasible to process such requests on a rolling, intra-day basis based on first-in/first-out.	It is necessary for the ISO to include a deadline for evaluating Manual Reference Level Change Request so the ISO may review all requests in a timely manner. Additionally, the ISO proposed to evaluate manual requests in the morning because it was consistent with updating gas prices for the day-ahead and real-time market
30.11.4.3  (CCDEBE Language)	The Six Cities	The Six Cities proposes the following edits:  “...the CAISO Market Processes and for Settlement purposes <u>as specified in Section 30.11.5.</u> ”	The ISO will make this change.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.11.5  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. questions if the phrase “Revised Reference Level” is intended to be a defined term.	No. The ISO does not believe it needs to be capitalized. The ISO will lower case the term Revised.
30.11.6  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. proposes the following edits:  “In the event a Scheduling Coordinator that controls both a hydro resource and <u>a</u> gas-fired resource in the same gas region submits a manual Reference Level Change Request to both the hydro resource’s Hydro Default Energy Bid and the gas resource’s Reference Level, and the CAISO accepts the manual Reference Level Change Request for the natural gas- <del> fired</del> resource...”	The ISO will make this change.
30.11.6  (CCDEBE Language)	The Six Cities	The Six Cities proposes the following edits”  “...manual Reference Level Change Request <u>for</u> <del>to</del> both the hydro...”	The ISO believes the sentence reads correct as is.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.11.6  (CCDEBE Language)	The Six Cities	The Six Cities asks the question of why use the word “may” in the last sentence of the section as it implies that the ISO may not make such an adjustment. The Six Cities states that if the ISO did intend to use “may,” then the section should include criteria for making the determination to adjust or not.	The ISO believes the sentence reads correct as is.  The ISO will not necessarily update a fuel region if just one hydro deb gets updated. The ISO would expect to have to have at least three adjustments to hydro DEBs to adjust gas fuel region. But it is not clear if that works in all cases. Therefore, it is important to have flexibility to not update the fuel region if necessary.
30.12.1  (CCDEBE Language)	The Six Cities	The Six Cities suggests the following edits:  “ <del>The</del> <u>A</u> Scheduling Coordinator may request uplift payment to cover...”	The ISO will make this change.
30.12.3  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. questions if the ISO, which does not procure fuel, decide what procurement practices are prudent? NRG Energy, Inc. further questions what the ISO’s basis is for determining what constitutes prudent.	The ISO will decide this based on the information provided by the Scheduling Coordinator. If the Scheduling Coordinator does not agree with the ISO’s determination, it can request recovery through a FERC filing as provided in Section 30.12.5.





# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.12.3  (CCDEBE Language)	Southern California Edison Company	Southern California Edison Company proposes the following edits:  “Permissible supporting documents include invoices for fuel purchased or other appropriate documentation demonstrating fuel or fuel-equivalent costs actually procured exceed the fuel or fuel-equivalent costs the CAISO used <del>in</del> to develop the resource’s Reference Levels.”	The ISO will make this change.
30.12.3  (CCDEBE Language)	The Six Cities	The Six Cities proposes the following edits:  “...fuel-equivalent costs actually <del>produced</del> <u>incurred</u> that exceed the fuel...”	The ISO will make this change.
30.12.4.1(b)  (CCDEBE Language)	The Six Cities	The Six Cities suggests the following edits:  “for evaluation pursuant to this Section 30.12. <del>24</del> .”	The ISO will make this change.
30.12.4.2  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. questions if the ISO, which does not procure fuel, decide what procurement practices are prudent? NRG Energy, Inc. further questions what the ISO’s basis is for determining what constitutes prudent.	See ISO’s note above.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.12.4.3  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company notes that there is a grammatical error.	See the ISO's note below.
30.12.4.3  (CCDEBE Language)	The Six Cities	The Six Cities suggests the following edits: "...verification that the resource's actually <del>procured</del> <u>incurred</u> costs claimed by the Scheduling Coordinator..."	The ISO will make this change.
30.12.5.1  (CCDEBE Language)	The Six Cities	The Six Cities proposes the following edits: "...not eligible to recovery <del>fuel</del> costs through..."	The ISO will make this change.
30.12.5.2  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. proposes edits to provide clarity. NRG Energy, Inc. added the phrase "reflecting the revised Bid Cost Recovery amounts," because as currently written the sentence merely states that the ISO will issue Recalculation Settlement Statements when section 11.29 already states that. NRG Energy suggests the following edits:  "To the extent the FERC issues an order finding the resource actually procured costs claimed by the Scheduling Coordinator <u>that</u> were not recovered through the Bid Cost Recovery process, the CAISO will resettle Bid Cost Recovery using revised Bid Costs for the resource so these costs can be	The ISO accepts the proposed change in part.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
		recovered and issue Recalculation Settlement Statement(s) <u>reflecting the revised Bid Cost Recovery amounts</u> within the normal Recalculation Settlement Statements timelines specified in Section 11.29.”	
30.12.5.2  (CCDEBE Language)	The Six Cities	The Six Cities suggests the following edits: “...finding the resource actually <del>procured</del> <u>incurred</u> costs claimed by the Scheduling Coordinator <u>that</u> were not recovered...”	The ISO will make this change.
30.12.6  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. suggests the following edits: “Scheduling Coordinators must submit supporting documentation that demonstrates that submitted costs represent actually procured daily fuel <del>or</del> fuel-equivalent equivalent costs for a given Trading Day...” “...costs the CAISO used <del>in</del> to develop the resource’s Reference Levels.”	The ISO will make this change.
30.12.6  (CCDEBE Language)	The Six Cities	The Six Cities proposes the following edits: “...submitted costs represent actually <del>procured</del> <u>incurred</u> daily fuel <del>or</del> fuel-equivalent <del>equivalent</del> costs for a given...”	The ISO will make this change.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
30.12.6  (CCDEBE Language)	The Six Cities	The Six Cities proposes the following edits: “...fuel-equivalent costs actually <del>procured</del> <u>incurred</u> exceed the fuel or fuel-equivalent costs the CAISO used <del>in</del> to develop the resource’s Reference Levels.”	The ISO will make this change.
34.11  (CCDEBE Language)	The Six Cities	The Six Cities proposes the following edits: “...along with Start-Up Bids, Transition <del>Cost</del> <u>Bids</u> , and Minimum Load Bids...”	The ISO will make this change.
39.6.1  (Order No. 831 Language)	The Six Cities	The Six Cities suggests the following edits: “...shall apply to limit <del>;</del> Energy Bids, RUC Availability Bids, and Ancillary Service Bids.”	The ISO will make this change as part of its Order No. 831 compliance filing.
39.6.1.1.2  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company asks if Scheduling Coordinators are submitting Bids or documentation of Bid Cost Recovery.	Scheduling Coordinators submit Energy Bids. If submitting an automated Reference Level Change Request, Section 30.11 requires submission of Contemporaneously Available Information only after audited by the ISO. If submitting a manual request, must submit Contemporaneously Available Information with the manual request.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
39.6.1.6.1(3)  (CCDEBE Language)	The Six Cities	The Six Cities suggests the following edits:  “The most geographically appropriate <u>prices</u> will apply to a particular resource.”	The ISO will make this change.
39.6.1.6.2  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company asks if the change is related to the Commitment Cost Enhancements Phase 3 initiative and is a cleanup change.	This change is to include new terminology used with CCDEBE. It is not related to CCE3.
39.7.1.1.1.2  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company asks if the language is accurate, if it is supposed to read as the CAISO or if Pacific Gas & Electric Company should not include the values in its master file cost curves.	The ISO will include these costs in the Master File if appropriate.
39.7.1.1.1.3(b)(i) and 39.7.1.1.1.3(c)(i)  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. questions clarification on the meaning of this sub-section. In particular, NRG Energy, Inc. requests clarification on the interaction between the 90 days of data and the testing every six months. NRG Energy, Inc. requests that the ISO re-write the sentence to clarify what the ISO	The ISO will clarify this section as follows:  “The historical average volume of the Monday-only index at a given location, using no more than 90 days of trading, is at least 25,000 MMBTUs; <u>based on the CAISO’s test of whether the volume at a given location is above 25,000 MMBTUs conducted at least once which the CAISO will test</u> every six (6) months; and ...”



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
39.7.1.1.1.3(b)(i) and 39.7.1.1.1.1.3(c)(i)  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. requests that the ISO describe to market participants why it shoes the specific criteria.	FERC requires that all indices utilities propose to use in their tariffs meet certain liquidity criteria. See FERC in Docket#: PL03-3-005. Price Discovery in Natural Gas and Electric Markets, 109 FERC ¶ 61,184 (2004). Because the Monday-Only index is only released, at best once a week, it is not the type of index to which the criteria established in PL03-3 can be easily applied. The ISO proposes the additional tests to provide assurances that the when it uses the Monday-Only index it is not susceptible to manipulation, consistent with the principles established in PL03-2.
39.7.1.1.2  (CCDEBE Language)	The Six Cities	The Six Cities suggests the following edits:  <del>...with the CAISO-charged with calculating Default Energy Bid."</del>	The ISO will make this change.
40.6.8.1.1  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company questions why wouldn't import points always have a history to use the LMP option.	Historically, this methodology has not applied to non-resource specific system resources. The ISO is conducting a stakeholder process to develop appropriate screens for intertie bids in excess of \$1,000/MWh, which would be implemented concurrent with Order No. 831 implementation.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
- Default Energy Bid  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. proposes the following edits to the definition of Default Energy Bid:  “The cost-based Energy Bid Curve calculated by the CAISO pursuant to Section 39, <u>and used</u> , among other things, in Local Market Power Mitigation.”	The ISO will make this change.
- Documentation of Contemporaneously Available Information  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. suggests the following edits to the definition of Documentation of Contemporaneously Available Information:  “Documents, that exist when a Reference Level Change Request is submitted...”	The ISO does not believe that this comma is necessary.
- Documentation of Contemporaneously Available Information  (CCDEBE Language)	The Six Cities	The Six Cities suggests the following edits to the definition of Documentation of Contemporaneously Available Information:  “...gas purchased invoices; evidence of a bid price that was part...”	The ISO will make this change.
- IFM AS Bid Cost  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. proposes the following edits to the definition of IFM AS Bid Cost:  “The Bid Cost <u>for Ancillary Service capacity in the IFM which</u> a Scheduling Coordinator <u>for Ancillary Service capacity in the IFM</u> may be eligible to recover <u>through the Bid Cost Recovery Process</u> , calculated pursuant to Section 11.8.2.1.6.”	The ISO will make part of this change.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
- IFM Minimum Load Cost  (CCDEBE Language)	The Six Cities	The Six Cities proposes the following edits to the definition of IFM Minimum Load Costs:  “The Minimum <u>Load</u> Bid Costs a Scheduling Coordinator may...”	The ISO will make this change.
- Minimum Load Bid  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. requests that the ISO provide the tariff cross-references for the definition of Minimum Load Bid.	The ISO will make this change and add the tariff cross references of tariff sections 30.7.10, 30.7.12, and 30.11.
- Minimum Load Bid  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company requests that the ISO specify the tariff cross-references for the definition of Minimum Load Bid.	See the ISO’s note above
- Minimum Load Bid  (CCDEBE Language)	The Six Cities	The Six Cities asks if the ISO has identified the appropriate section number referenced in the last line of the definition.	See the ISO’s note above.
- Minimum Load Bid Cost  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. proposes the following edits to the definition of Minimum Load Bid Cost:  “The Minimum Load Costs submitted in a Minimum Load Bid as modified pursuant to Sections 30.7.10, 30.7.12 and 30.11 used for purposes clearing the applicable CAISO	The ISO will make this change.





# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
		Market Process and for <del>the determination of a</del> Bid Cost Recovery.”	
- Minimum Load Bid Cost  (CCDEBE Language)	The Six Cities	The Six Cities suggests the following edits to the definition of Minimum Load Bid Cost:  “...used for purposes <u>of</u> clearing the applicable CAISO Market Process and for the determination of <del>a</del> -Bid Cost Recovery.”	The ISO will make this change.
- Minimum Load Cost  (CCDEBE Language)	The Six Cities	The Six Cities suggests the following edits to the definition of Minimum Load Cost:  “...Resource-Specific System Resources, Participating Load, Reliability Demand Response Resource...or Proxy Demand Resource <del>may not</del> <u>must</u> be non-negative <u>and</u> may be adjusted...”	The ISO will make this change.
- Minimum Load Cost Hard Cap  (Order No. 831 Language)	NRG Energy, Inc.	NRG Energy, Inc. questions if the ISO means that it would actually change the resource’s Minimum Load if the Minimum Load is less than 1 MW, or will use 1 MW for the purpose of the calculation.	It will use the 1 MW for this purpose.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
- Minimum Load Cost Hard Cap  (Order No. 831 Language)	NRG Energy, Inc.	NRG Energy, Inc. provides the following edits to the definition of Minimum Load Cost Hard Cap:  “The maximum Minimum Load Cost used in the CAISO Markets, <u>which shall be</u> set at \$2,000 per MWh. The CAISO will <u>apply</u> calculate this limit <u>to individual resources</u> by dividing the resource’s Minimum Load Cost by its Minimum Load.”	The ISO will make this change as part of its Order No. 831 compliance filing.
- Non-Resource-Specific System Resource  (CCDEBE Language)	The Six Cities	The Six Cities suggests the following edits to the definition of Non-Resource-Specific System Resource:  “ - <del>Non-Resources-Specific System Resource</del> ”	The ISO will make this change.
- Reasonableness Threshold  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. comments that in section 30.11.1.2.1, the ISO will use 25% or 10% adders to calculate the Reasonableness Thresholds. NRG Energy, Inc. states that if the gas price changes by more than the adder, the Reasonableness Threshold will not be reasonable. NRG Energy, Inc. questions if the word “reasonable,” as proposed, is needed.	The “reasonableness” term is appropriate because it is used in the context of the automated process to determine if a change request is reasonable. The CAISO is also proposing to provide the opportunity to submit a request for manual review because we recognize that the threshold cannot capture all situations.
- Reference Level Change Request  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. comments that this is where the ISO should clearly differentiate between automated and manual reference level change requests.	The ISO is continuing to consider this comment.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
- RTM AS Bid Cost  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. proposes the following edits to make the definition of RTM AS Bid Cost parallel with its counterparts:  “The Bid Cost of a Scheduling Coordinator for Ancillary Service capacity in the RTM may be eligible to recover <u>through the Bid Cost Recovery Process calculated</u> pursuant to Section 11.8.4.1.6.”	The ISO will make this change.
- RTM AS Bid Cost  (CCDEBE Language)	The Six Cities	The Six Cities suggests the following edits to the definition of RTM AS Bid Cost:  “The Bid Cost <del>of a Scheduling Coordinator</del> for Ancillary Service capacity in the RTM <u>a Scheduling Coordinator</u> may be eligible to recover pursuant to Section 11.8.4.1.6.”	The ISO will make this change.
- RUC Minimum Load Cost  (CCDEBE Language)	The Six Cities	The Six Cities suggests the following edits to the definition of RUC Minimum Load Cost:  “The Minimum <u>Load</u> Bid Costs a Scheduling Coordinator may be eligible to recover through the Bid Cost Recovery Process calculated pursuant to Section 11.8.4.1.2.”	The ISO will make this change.
- Soft Energy Bid Cap  (Order No. 831 Language)	The Six Cities	The Six Cities proposes the following edits to the definition of Soft Energy Bid Cap:  “The maximum Energy Bid Price <u>submitted by</u> Scheduling Coordinators <del>submitted</del> for resources, except for Virtual Bids and...”	The CAISO will make this change but change the word “price to lower case.



Tariff Section	Market Participant	Stakeholder Comment	ISO Response
- Start-Up Bid  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company asks if the start-up time is the value in the master file or if it indicated for the specific Trading Day.	The ISO is continuing to consider this comment.
- Start-Up Bid  (CCDEBE Language)	The Six Cities	The Six Cities suggests the following edits to the definition of Start-Up Bid:  “...are subject to modification pursuant to the rules set forth in Section 30.7.8...”	The ISO will make this change.
- Start-Up Bid Cost  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. proposes the following edits to the definition of Start-Up Bid Cost:  “The Start-Up Costs submitted in a Start-Up Bid as modified pursuant to Section 30.7.8 and 30.11 used for <del>purposes of the determination of a</del> Bid Cost Recovery.	The ISO will make this change.
- Start-Up Bid Cost  (CCDEBE Language)	The Six Cities	The Six Cities asks why the format for this definition is different that the format used in other related definitions, e.g., the definition for RUC Start-Up Bid Cost.	These are different than the costs the ISO considers eligible for bid cost recovery such as RUC Start-Up Bid Costs, which the CAISO validates are eligible for recovery in specific markets.
- Start-Up Bid Cost  (CCDEBE Language)	The Six Cities	The Six Cities proposes the following edits to the definition of Start-Up Bid Cost:  “...for purposes of the determination of <del>a</del> Bid Cost Recovery.”	The ISO will make this change.



# California ISO

Tariff Section	Market Participant	Stakeholder Comment	ISO Response
- Subset of Hours Contract  (CCDEBE Language)	Pacific Gas & Electric Company	Pacific Gas & Electric Company asks where the term Subset of Hours Contract is used in the tariff.	The ISO believes this term is no longer used in the tariff. The ISO has confirmed and will delete as necessary.
- Transition Bid  (CCDEBE Language)	NRG Energy, Inc.	NRG Energy, Inc. questions if the ISO is proposing to define "Transition" as a newly defined term. NRG Energy, Inc. further questions that if the ISO is proposing "Transition" as a new term, if the ISO can define it, or if it is not a newly defined term, then the word should not be capitalized.	No. The ISO will correct that typo and will use lower case for Transition.
Appendix II, Section B	The Six Cities	The Six Cities proposes the following edits: "Separate and apart <del>from</del> Part A of this Appendix, Part B provides the rates, terms and conditions that apply to Scheduling Coordinators that submit..."	The ISO will make this change.  The CAISO will defer the Appendix II changes to CCDEBE Phase 2.
Appendix II, Section B, 1.2	The Six Cities	The Six Cities suggests the following edits: "...submits a Bid that is not at or below <del>their</del> <u>the resource's</u> Default Energy Bid, the CAISO will reject the Bid."	The ISO will make this change.  The CAISO will defer the Appendix II changes to CCDEBE Phase 2.
Appendix II, Section B, 1.3	The Six Cities	The Six Cities proposes the following edits: "...all the resource's Economic Bid segments with the <u>resource's</u> Default Energy Bid."	The ISO will make this change.  The CAISO will defer the Appendix II changes to CCDEBE Phase 2.



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Tariff Section	Market Participant	Stakeholder Comment	ISO Response
Appendix II, Section B, 3.1	The Six Cities	The Six Cities proposes the following edits: “...resources of Market Participants subject to Part B of this Appendix may <del>be eligible to</del> select any of the options available under Section 30.4 of the CAISO Tariff for their Default Commitment Costs <u>provided the resource otherwise qualifies for the requirements specified therein.</u> ”	The ISO will make this change. The CAISO will defer the Appendix II changes to CCDEBE Phase 2.