

April 27, 2015

**COMMENTS ON BEHALF OF THE CITIES OF ANAHEIM, AZUSA, BANNING,
COLTON, PASADENA, AND RIVERSIDE CALIFORNIA ON THE ENERGY
IMBALANCE MARKET YEAR 1 ENHANCEMENTS PHASE 1 TARIFF LANGUAGE**

In response to the ISO's request, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the "Six Cities") submit the following comments on the ISO's Energy Imbalance Market Year 1 Enhancements Tariff Language.

- Section 29.32 (a)(3)(C) of the ISO's proposed Tariff language appears to be inconsistent with the description of this provision provided in the ISO's Energy Imbalance Market Year 1 Enhancements Draft Final Proposal ("Draft Final Proposal"). The Draft Final Proposal, at page 11, describes the hourly Greenhouse Gas MW quantity and bid price to be submitted by imports on EIM external interties. Likewise, Section 29.32(a)(3)(C) relates to an EIM External Intertie transaction price. However, beyond that similarity, the description in the Draft Final Proposal and the related Tariff language seem inconsistent or potentially even unrelated. The Six Cities request that the ISO provide additional information explaining Section 29.32 (a)(3)(C) of the proposed Tariff language and how it relates to its explanation in the Draft Final Proposal.
- Section 29.32 (a)(4), which deals with the Minimum Bid Adder Price states: "The price included the EIM Bid Adder shall not less than \$0/MWh." It appears that this sentence is incomplete, and it is unclear as written. The Six Cities request that the ISO clarify Section 29.32 (a)(4).
- Section 29.7 (D) includes what appears to be a typo that should be corrected by the ISO. Specifically, this section states that the CAISO may "... establish an Administrative Price in the Real-Time Market in accordance with Section 7.7.49 . . ." The Six Cities believe that the reference to Section 7.7.49 is incorrect, and the referenced section should be either 7.7.4 or 7.7.9. The Six Cities request clarification with regard to the appropriate reference in Section 29.7 (D).
- Section 29.7 (E) should be revised to remove the second "or" in the following statement: "in additional or as an alternative, or take any of the actions . . ."
- The ISO's revision to Section 29.34 (m)(5) adds a repeated word that should be removed. Specifically, the following phrase includes the word "that" repeated twice: "... by reducing the total Flexible Ramping Constraint capacity requirement for each Balancing Authority Area by the total amount of EIM Internal Intertie import capability to that that Balancing Authority Area . . ."

The Six Cities have identified no additional provisions that require changes or clarification at this time, and take no position on other revisions proposed by the ISO.

Submitted by,

Bonnie S. Blair
Rebecca L. Shelton
Thompson Coburn LLP
1909 K Street, N.W. Suite 600
Washington, D.C. 20006-1167
bblair@thompsoncoburn.com
rshelton@thompsoncoburn.com
202-585-6900

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