

**COMMENTS OF THE CALIFORNIA COMMUNITY CHOICE ASSOCIATION (CalCCA) ON
THE RELIABILITY MUST-RUN AND CAPACITY PROCUREMENT MECHANISM STRAW
PROPOSAL AND JULY 11' 2018 STAKEHOLDER MEETING**

In response to the CAISO RMR and CPM Phase 2 stakeholder meeting on July 11th, CalCCA provides the following comments. Regarding BPM PRR 1056, the CAISO should provide the information to the interested parties first (owner/operator) to ensure information is correct prior to releasing to the public. In addition, as corrections and additions are published, a market message should be sent out alerting the market and providing the link to view the updates.

The CAISO was asked about the billing calculation for collective CPM under CAISO CPM Tariff, 43A.2.2.1. The tariff does not allow for an individual LSE to be credited the CPM cost for their share of a collective deficiency should they have purchased MWs from the unit that is being CPM'd. Instead the "collective deficiency" is credited, leaving still a large cost obligation to the individual LSE. We ask to have a new initiative added to the stakeholder catalog to discuss further and recommend changing the tariff. CalCCA will be starting that formal process.

Submitted by,

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