**From:** Lamb, Darren, CAISO  
**Sent:** Thursday, September 26, 2024 2:56 PM  
**To:** Caroline Trum <[ctrum@naesb.org](mailto:ctrum@naesb.org)>  
**Subject:** RE: NAESB Distribution Services Base Contract Recommendation

Caroline,

For this response, I contacted out DER team and also a member of our legal team that is the PURPA expert.

This is our comment:

*We do not see any language in the NAESB template that is going to affect California contract structures.*

*The CAISO is not the entity to opine on PURPA interaction. The utilities and FERC have far more expertise (and interest) in PURPA than the CAISO.*

Thanks again for reaching out, much appreciated.

**Darren Lamb, CAISO**  
Operations Policy Manager

Operations Policy and Analytics