

**Appendix D**  
**Participating Intermittent Resource Program**  
**A Short Retrospective and**  
**Discussion of Participants' Request for Netting of Deviations over the Month**

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## I. OVERVIEW AND BACKGROUND

### A. Introduction

This paper presents a review and analysis of the request made by enXco, an operator of wind power plants in the Participating Intermittent Resource Program (PIRP or Program), and the California Wind Energy Association (CalWEA), a trade association, whose members include participants in the PIRP (collectively referred to as Proponents), for changes to the GMC rate structure/billing determinant in the context of the GMC Options for 2007 Process. To date there is general stakeholder support for an extension of the 2004 GMC settlement terms and conditions into 2007 until the earlier of MRTU implementation or December 31, 2007. This stakeholder support is premised on, *inter alia*, a continuation of the current GMC formula rate and rate design adopted in the 2004 settlement agreement. An accommodation of the Proponents' request would require the alteration of the GMC rate structure and some GMC participants might withdraw support for the continuation of the 2004 settlement terms. For these reasons, and all of the considerations set forth below, it is recommended that the ISO not grant the Proponents' request for GMC modifications without the support of the other GMC participants.

### B. Involvement of the Program Participants in the 2007 GMC Options Process.

Within the past year, PIRP participants have complained to ISO Operations staff that they believed the application of CTs 4506 and 4536 violated the agreement reached in 2001 concerning monthly netting of ISO charges<sup>1</sup>. ISO staff, principally Lisa Szot, told the PIRP participants that their request could be considered within the GMC stakeholder process that would be starting in late 2005.

On February 24, 2006, the ISO issued a market notice notifying interested parties that the ISO was considering GMC options for 2007. The ISO requested comments on an extension of the 2004 GMC Settlement. The ISO also solicited requests for potential changes in the current GMC rate structure. The ISO held a conference call on March 7 to briefly discuss the reasons for pursuing an extension of the Settlement and to again solicit comments and requests. On March 13, the ISO received seven comments from stakeholders. Among these were comments from enXco and CalWEA concerning the billing determinant used for assessing two GMC deviations related charges, CTs 4506 and 4536<sup>2</sup>. Both parties requested that the ISO base these charges on monthly-netted deviations amounts for PIRP participants, rather than the current interval netted amounts.

The ISO held its first stakeholder meeting on GMC options for 2007 on March 20, 2006. In that meeting, each party was given an opportunity to present its comments to other stakeholders. Bill Mason of enXco spoke in favor of the monthly netting of the billing determinant for CTs 4506 and 4536. In the discussion that ensued, no party, other than

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<sup>1</sup> We do not precisely know what prompted participants in PIRP to begin complaining last year rather than when the new GMC rates for deviations became effective.

<sup>2</sup> Neither CalWEA nor enXco are Scheduling Coordinators. Calpine serves as enXco's Scheduling Coordinator. No Scheduling Coordinator has submitted comments in support of this request. However, Calpine did file a dispute with the ISO concerning the application of CTs 4506 and 4536. This dispute was denied. Calpine did not pursue Good Faith Negotiations or seek arbitration. No other Scheduling Coordinator that schedules PIRP generation has submitted a dispute.

CalWEA, supported enXco's proposal, though parties requested information about the cost of such a change, and ISO has not yet provided such information. The ISO noted that any change in the GMC rate structure would have to be carefully crafted and would have to be supported by the majority of stakeholders, at a minimum. Without that support, the ISO explained that changes could not be made to the rate structure. For the purposes of showing support for the PIRP participants, however, the ISO did state that it was considering a separate initiative to address the broad range of concerns parties had with the Program. As part of this initiative, it might be possible to revisit the method of forecasting which might have a material effect on CTs 4506 and 4536 for participants in the Program. At the time, it appeared to ISO staff that enXco and CalWEA were amenable to this separation of PIRP-related issues from the 2007 GMC process.

However, at the second stakeholder meeting on April 25, enXco reiterated its request for the GMC accommodation. The ISO again stated that the ISO could not unilaterally accommodate the participants in the Program without consultation and agreement from the other GMC ratepayers, who would bear the cost. The ISO told enXco that it could still advocate for its accommodation, and if it obtained stakeholder support, the ISO would not reject the request and could include the monthly netting treatment in the FERC Section 205 filing.

We reviewed the information available and concluded that, in the absence of acquiescence by the other stakeholders, the Proponents' deviation request should not be included in the 2007 GMC process. In the discussion that follows, we will explain the basis for our recommendation. The information supporting our conclusions is organized into these sections:

- A Short Retrospective of the Participating Intermittent Resource Program
- Statistics on the Current Program
- The History of GMC Deviations Charges
- The Position of Other Stakeholders
- Recommendations.

### **III. A SHORT RETROSPECTIVE OF THE PARTICIPATING INTERMITTENT RESOURCE PROGRAM.**

We do not intend to fully describe the history of PIRP in this paper. This section is only meant to provide you with some background about the formation of the PIRP and the benefits and costs of the Program to the ISO, the participants in the Program and other market participants not in the program. This is not meant to be a comprehensive discussion of the program and the performance of the ISO and the participants in the Program.

The ISO instituted a stakeholder process to develop the Program in July 2001 at the direction of the Board<sup>3</sup>. A working group was formed consisting of representatives of the ISO, the State of California, wind power associations, wind power operators, generators, investor-owned and municipal utilities, the forecasting vendor and consultants. This working group met throughout the summer, developing a Consensus Proposal (Attachment 1 to this report) that was presented to the Board in September 2001. The key elements of the proposal were:

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<sup>3</sup> A complete set of ISO Board documents can be found on: <http://www.caiso.com/docs/2001/09/17/200109170919451324.html>.

1. A Forecasting Project to ensure high quality forecasts for Day Ahead and Hour Ahead Scheduling and a near real-time forecast to facilitate ISO system operations.
2. A monthly settlement period to net positive and negative deviations across all intervals within each calendar month.
3. A Forecasting Work Group to monitor performance of intermittent resources, impact on the ISO system and costs.

The participants would receive several benefits. Participants in the Program would be exempt or receive special treatment for several of the market charges. Deviations were to be netted over the month for market settlement. Participants in the Program would also be exempt from replacement reserve charges<sup>4</sup> and transmission losses.

In exchange for these benefits, the participants in the Program agreed to sign ISO agreements, install ISO meters, provide for telemetry of data, pay a forecast fee of 10 cents per MWh, and schedule consistent with the ISO's forecast of wind generation. AWS Tru-Wind is the vendor supplying the forecast.

Balancing these benefits to the participants in the Program were the costs imposed on the ISO and other market participants. The ISO incurred costs to implement operational, software, and settlement changes to accommodate the Forecasting Project and the netting of deviations over the month for Program resources. Other market participants would pay for the benefits received by the participants in the Program. As Imbalance Energy is procured and paid on a ten-minute interval basis, assessment of monthly netting of deviations may not recover the payments for Imbalance Energy. Typically, there is a shortfall in revenue because the revenue from monthly netting is less than the payments for Imbalance Energy. This shortfall is assessed to market participants through an assessment on Net Negative Deviations (CT 721). Participants in the Program are also exempt from Minimum Load Compensation Costs (CT 1697).

The Board approved the principles embodied in the consensus proposal in September 2001. In February 2002, the ISO filed Amendment 42, (ER02-922-000), seeking the FERC's approval for the Program. In March 2002, the FERC conditionally approved the filing. As a condition of approval, the ISO was to file a report detailing the performance of and costs associated with the Program 16 months after the adoption of the Program. As discussed in its July 2003 compliance filing, the ISO noted to the FERC that no intermittent resources had begun to schedule, nor were expected to schedule under the Program until late 2003. As it happened, the first intermittent resources began scheduling nearly a year later in June 2004. It should be noted that the ISO, in its July 2003 compliance filing, committed to report to the FERC on the costs and the performance of the Program by July 2004. The ISO has not submitted this report.

The current program is small relative to the amount of available capacity in the ISO Control Area. Total available generation in the Control Area at peak is over 50,000 MWs, with several thousand resource IDs representing different generation units. As of the end of 2005, there were 11 resource IDs in the Program. These units represent approximately 460 MWs of capacity, less than 1 percent of the total capacity in the Control Area. These Scheduling Coordinators and the

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<sup>4</sup> The ISO no longer procures Replacement Reserve.

associated units are shown in Table 1. We also note that PIRP participants represent approximately 20 percent of the 2300 MWs of wind generation resources in the State.

Table 1 Scheduling Coordinators with PIRP Generation Calendar Year 2005				
BA ID	SC ID	Name	Units	Pmax (MW)
1107	RVSD	City of Riverside	BUCKWD_7_WINTCV	1.3
2770	CRLP	Coral Power, LLC	CABZON_1_WINDA1 WHTWTR_1_WINDA1	41.0 61.5
3174	PCPM	PPM Energy	HIWIND_2_WINDA1 MTWIND_1_UNIT 3	162.0 22.4
3751	APX3	Automated Power Exchange	USWNDR_2_SMUD	15.2
5116	FPPM	FPL Energy Power Marketing, Inc.	GARNET_1_UNITS FLOWD2_2_FPLWND	16.5 18.0
5618	MVPP	Mountain View Partners	MTWIND_1_UNIT 1 MTWIND_1_UNIT 2	44.4 22.2
5719	OPPL	Calpine (pre-bankruptcy)	VINCNT_2_WESTWD	60.0
6220	OPPJ	Calpine (post-bankruptcy)	VINCNT_2_WESTWD	60.0
TOTAL				464.5
Notes:				
1. These are Scheduling Coordinators that scheduled PIRP generation in 2005.				
2. Pmax is the capacity identified in the Settlement tables to represent maximum capacity. It may not reflect the rated capacity of the unit.				

#### IV. BENEFITS AND COSTS OF THE PROGRAM.

To frame the balance of benefits and costs, we have summarized data related to the Program. These include the forecasting fee designed to recover the costs of the AWS Tru-Wind forecasting service, the market costs of procuring Imbalance Energy to offset deviations of Program generation, and the ISO's administrative cost for managing deviations.

In Table 2, we show historical amounts of the forecast fee collected (CT 701) and the actual payments to the vendor. The forecast fee is a Tariffed rate that was filed in the Amendment 42 filing. This rate is 10 cents per MWh of generation by a Program participant. Since inception, the forecast fee has not been sufficient to recover the ISO's cost of the Tru-Wind forecasting service. In Table 1, we show the amount collected from the forecast fee. Since the Program was implemented in 2004, the ISO collected in CT 701 approximately \$186,000. The payment to the forecast vendor, Tru-Wind, for this same period has totaled approximately \$305,000. This difference, approximately \$119,000, is borne by all ISO ratepayers. This amount does not include any internal ISO costs to

administer the Program, which include at least one FTE<sup>5</sup> and additional costs within Real Time Operations to manage deviations from generators scheduling in the Program.

Table 2 Forecast Fee Collection and Cost Participating Intermittent Resource Program 2004 and 2005 Preliminary and Draft			
Period	CT 701 Collection	Actual Cost	Shortfall
2004	\$57,472	\$65,227	(\$7,755)
2005	\$128,516	\$241,171	(\$111,655)
Total	\$185,988	\$305,398	(\$119,410)
Notes:			
<ol style="list-style-type: none"> <li>1. CT 701 is the recovery of forecasting costs through the 10-cent per MWh forecast fee.</li> <li>2. Actual cost represents total payments to AWS Tru-Wind for its forecasting service and associated costs.</li> <li>3. Preliminary and draft, subject to refinement.</li> </ol>			

Another benefit occurs as the use of monthly netting of deviations for assessing market charges on a PIRP resource typically results in a market revenue shortfall. As the ISO procures Imbalance Energy on a ten-minute interval basis, actual procurement costs to manage deviations may not match the assessment on the monthly net deviations. The total cost of this Imbalance Energy is identified in CT 731<sup>6</sup>. Since Program inception to the end of 2005, actual procurement costs (CT 731) have totaled \$3.4 million. (See Table 3.) The deviations charge to participants in the Program is CT 711, which has totaled approximately \$505,000 from Program inception to the end of 2005. The under- or over-recovery of these costs is allocated to other market participants based on their Net Negative Deviations through CT 721. Over this same period, CT 721 charged to all market participants was approximately \$2.9 million.

<sup>5</sup> Until she left, Lisa Szot was the only ISO staff member fully assigned to monitor the Program.

<sup>6</sup> CT 731 is not a charge to market participants. It is used for ISO recordkeeping purposes to show that the correct amount has been recovered from Program participants and other market participants.

Table 3  
Market Charges for Managing Deviations  
Participating Intermittent Resource Program  
2004 and 2005  
Preliminary and Draft

Period	CT 731 (Total Procurement Cost)	CT 711 (Paid by PIRP)	CT 721 (Allocated to Market)
2004 (six months)	\$765,595	\$100,110	\$665,491
2005	\$2,665,304	\$405,598	\$2,259,707
Total	\$3,430,899	\$505,708	\$2,925,197

Notes:

1. CT 711 is the assessment of net monthly deviations to participants in the Program based on a weighted average price for Imbalance Energy over the month.
2. CT 721 is the assessment of market Imbalance Energy costs in excess of the amount calculated in CT 711.
3. CT 731 is used by the ISO for recordkeeping purposes and is not assessed to market participants. It represents the total cost of procuring Imbalance Energy to manage the deviations of the participants in the Program. It is approximately the sum of CTs 711 and 721.
4. Improvements in the forecasting method would decrease the amount of Imbalance Energy procured and result in lower CT 711 and CT 721 amounts. The amount by which the forecast and charges might be changed is unknown at this time.
5. A portion of CT 721 is assessed to Scheduling Coordinators with PIRP generation. At this time, we do not have adequate information on the portion that is directly attributable to PIRP generation.
6. Preliminary and draft, subject to refinement.

An additional benefit to PIRP participants would result if GMC CTs 4506 and 4536 were based on deviations netted over the monthly for participants in the Program. As ISO administrative costs are fixed during the year, a reduction in payments by one party is borne by other parties. In Table 4 below, we present data on GMC deviations-related charges for 2005, including an estimate of that paid by participants in the Program. This is only an estimate because what participants in the Program actually pay will depend on the contractual relationship that they have with their Scheduling Coordinator and how the Scheduling Coordinator flows through ISO administrative charges to the participants in the Program. For the Scheduling Coordinators identified in Table 1, a total of \$1.4 million was billed for CTs 4506 and 4536 (line 5, Column A). Assuming that the Scheduling Coordinators correctly identified the deviations of the PIRP generation and these costs were flowed through, we estimate that participants in the Program would have paid approximately \$700,000 for CTs 4506 and 4536 in 2005 (line 5, Column B). If deviations were netted over the month as the proponents have requested, the resulting GMC cost would be approximately \$56,000 (line 5, Column C). Costs shifted to other market participants would be the difference in the

cost avoided (\$700,000) and the cost of the monthly-netted deviations (\$56,000), or approximately \$642,000 (line 5, Column D)<sup>7</sup>.

Table 4 Total Uninstructed Deviation and GMC For Scheduling Coordinators with Participating Intermittent Resources Calendar Year 2005					
Line number		Total GMC UIE for SCs with PIRP generation	Estimated PIRP portion of A	Estimated monthly netted deviations for PIRP generation	Shortfall to be collected from other market participants
		A	B	C	D
1	Total for 2005	970,774	466,062	38,276	427,786
	GMC Rates				
2	CT 4506	\$ 0.7960	\$ 0.7960	\$ 0.7960	\$ 0.7960
3	CT 4536	\$ 0.7041	\$ 0.7041	\$ 0.7041	\$ 0.7041
4	Total GMC	\$ 1.5001	\$ 1.5001	\$ 1.5001	\$ 1.5001
5	Total	\$ 1,456,258	\$ 699,139	\$ 57,417	\$ 641,722
Notes:					
1. Rates shown for 2005 were actual rates charged in 2005.					
2. The estimated monthly netted deviations for PIRP generation, column C, assumes that each Scheduling Coordinator is able to separately identify the deviations from PIRP generation and properly flow through these charges to that generation.					

In summary, in 2005 if the ISO had granted the Proponents' request, the level of benefits for participants in the Program would have been approximately \$3.0 million, consisting of \$112,000 (Table 2) from the under-recovery of forecasting costs, \$2.3 million (Table 3) from the under-recovery of market costs and \$642,000 (Table 4) from the potential under-recovery of GMC costs.

The total benefits and costs of the Program will not be a static amount. It will change as the number and capacity of generation in the Program grows or as market prices or rates change. It is also possible that improvements in the forecast method may reduce Imbalance Energy procurement by the ISO and result in lower CT 711 amounts assessed to participants in the Program and lower CT 721 amounts assessed to non-participants.

<sup>7</sup> The Scheduling Coordinators that have a mixture of generation types, as well as generation in the Program, would pay a portion of the cost shift. As a practical matter, if the ISO were to implement this accommodation, the ISO would modify GMC rates and rate structure.

## V. HISTORY OF GMC DEVIATIONS CHARGES

In their discussion of the Program, the Proponents also claim that the Program benefits were to extend to all ISO charges including GMC. Contrary to the Proponents' claims, ISO personnel involved in the development of the Program do not recall the ISO offering to extend the monthly netting to ISO administrative charges. This is not to say the ISO considered and denied that treatment, but rather it appears that the ISO's PIRP team just did not consider this issue. A review of Amendment 42 and the filings subsequent to its submittal to the FERC show no mention of monthly netting applying to the GMC. Participants in the Program did not protest the lack of this aspect in the filing, nor have they filed a complaint at the FERC on this issue. It is not possible to say definitively whether there was a lack of understanding of the nature of the ISO's GMC by participants or miscommunication between the ISO and participants.

The changes to the 2004 GMC rate structure implemented in 2004 did not represent a departure from previous ISO practice. If the Program had been operational during the period 2001 through 2003, participants in the Program would have been assessed GMC for Uninstructed Deviations. Among the three GMC rates in effect in the period 2001 through 2003 was the Market Operations charge (CT 523 and later CT 524), which was assessed on purchases and sales of Ancillary Services, Instructed Energy and Uninstructed Deviations. The Market Operations charge was designed to recover the ISO's administrative cost of managing markets to procure Imbalance Energy and Ancillary Services. Both Instructed Energy and Uninstructed Deviations were, and still are, measured in ten-minute intervals. Uninstructed Deviations are the difference between actual and scheduled generation by resource ID or load, measured as an absolute value.

At the beginning of 2004, the ISO implemented a new GMC rate structure that included further unbundling. With the implementation of the new rate structure, the ISO continued to have rates designed to recover the ISO's administrative costs of managing markets, now called Market Usage (CTs 4534, 4535, and 4536). The Market Usage charge was recovered from billing determinants similar to the previous Market Operations charge, with the exception of the deviations billing determinant. Deviations are now netted over the SC's portfolio, in theory, allowing market participants to follow load in real time. Net Uninstructed Deviations, as the deviation-related billing determinant is called, are measured over the ten-minute interval, but first summed across all resource IDs and load (positive deviations canceling out negative deviations) before an interval total is calculated as the absolute value. This typically results in a smaller net deviation amount for any Scheduling Coordinator with a diversified portfolio of generation or load. In the case of a Scheduling Coordinator with a single resource, however, this method results in no change from the previous approach used for the "Market Operations" charge, as there are no potential offsetting deviations.

The GMC rate structure implemented in 2004 also contained the Energy Transmission Services – Uninstructed Deviations rate (CT 4506). This rate was assessed to Net Uninstructed Deviations, the same billing determinant as was used for Market Usage (CT 4536). Energy Transmission Services – Uninstructed Deviations is designed to recover a portion of the ISO's administrative costs of managing deviations in real time, rather than recovering the costs of managing markets as the Market Usage does.

The new rate structure was implemented with more than adequate public notice. The development of the new GMC rate structure for 2004 was the result of a stakeholder process begun in the late summer of 2002. That process involved extensive stakeholder interaction including some 20 meetings or conference calls over 12 months, the formation

of a GMC working group of ISO staff and stakeholders, regular publishing of ISO and stakeholder documents on the ISO website and a special public session Finance Committee meeting for discussion and debate of different proposals. A review of our public record, which totaled some 4,000 pages when filed, shows no concerns raised about the new GMC deviations-related charges by participants in the Program. We can find no evidence of involvement by participants in the Program.

Participants in the Program also had an opportunity to participate in the GMC Settlement discussions at the FERC in the winter and spring of 2004, wherein changes were made to the rate structure that resulted in a reassignment of costs. This reassignment of costs resulted in higher assessments on deviations. No issues were raised about the impact of deviations-related charges on participants in the Program. Our review of the record shows that PPM Energy, a Scheduling Coordinator that schedules generation in the Program, was a party to the settlement discussions, but it did not raise any issue with respect to deviations. We recognize, however, that participants in the Program, like other market participants, often do not have the capacity or inclination to participate in all ISO proceedings, and often only object when they realize a provision adversely affects them<sup>8</sup>.

Furthermore, irrespective of the justification for monthly netting of deviations for market charges, the ISO must staff operations and maintain system applications to manage deviations within each interval regardless of the source of those deviations. Even if deviations balance out during the month, the ISO must balance the system each and every interval and incurs costs doing so. If participants in the Program do not pay these costs, other market participants must.

## **VI. POSITIONS OF OTHER STAKEHOLDERS**

With the exception of enXco, and the CalWEA, no stakeholder has spoken in support of netting deviations during the month for CTs 4506 and 4536. While the CPUC has expressed some sympathy for the PIRP GMC issue, it is from the perspective of avoiding unnecessarily costly and time-consuming litigation.

## **VII. RECOMMENDATIONS**

### **A. Preferred Course of Action**

Balancing benefits and burdens, we recommend that the ISO not unilaterally offer a GMC accommodation for the PIRP GMC issue. This is aligned with our message in the stakeholder meetings – an accommodation for the PIRP GMC issue has to be agreed to by all or substantially all of the participants. It is likely that offering an accommodation would cause the ISO to lose the support of some of the other GMC participants as no other GMC-paying participant has spoken in support of the PIRP GMC issue. As we offered and as stakeholders requested, we will provide the cost shift information to participants in the Program and other GMC parties, for Participants to make their case to others.

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<sup>8</sup> We note this was the case in the first year of the 2004 GMC rate structure, where exporters objected to a demand charge on exports. In settlements discussions, CAISO revised this to an “energy” based charge.

Even if the changes in the GMC requested by the participants in the Program are not implemented, we will continue to work diligently to reassure them of our commitment to the PIRP and to the PIRP Initiative (to improve the Program) led by Keith Johnson.

### **B. The Alternative Course of Action**

The alternative is to grant the Proponents' request. This will likely ensure that the PIRP will prosper in future years more so than at present. However, this course of action could have undesirable consequences that will be more difficult to address if we proceed down this path.

Most importantly, it is very likely that some of the other GMC participants would no longer support a continuation of the GMC Settlement. We will then be without a waiver of protests on our rate structure filing, which includes the revenue requirement trigger, and the FERC filing process will become much more cumbersome and time-consuming. Without the broad support of the GMC participants, it is likely that we would have to perform a cost of service study to support the proposed rates, including the new allocation of costs due to the monthly netting requested by the participants in the Program. In the face of significant opposition, an evidentiary hearing is likely, which would consume limited Finance and other ISO resources at the time when these resources are needed to begin the stakeholder process for the MRTU GMC rate design. Should the alternative this course of action be followed, we might opt to prepare an "MRTU ready" GMC structure, but that would be very challenging to accomplish during 2006.

Another consequence is the possibility that future GMC and Budget stakeholder projects will be more contentious. Over the past three years we believe that we have succeeded in building some good faith with stakeholders, which have yielded significant benefits to the ISO over the past three years. These benefits have come in the form of "peace" in the GMC and Budget forums, which has allowed the non-Finance divisions to focus on MRTU implementation. We have also used this cooperation to work out the GMC refund issues for 2004, including cooperative relationships with the Modesto Irrigation District and PG&E while working out details of the PGAB/Modesto payment mechanism envisioned in the GMC Settlement. It is likely that we would have to work diligently to recover this loss of good will.

We could look for ways to offset the additional costs of monthly netting on all market participants by increasing the forecasting fee and other changes to be identified by the PIRP Initiative. However, this may not be sufficient to overcome resistance on the part of some of the other GMC participants.

Finally, should the ISO implement monthly netting of GMC deviations for the participants in the Program, the Settlements system will need to be reprogrammed to properly automate the tracking of monthly-netted deviations. There is no realistic alternative to that work effort – manually corrected invoices each month are not feasible. As you know, manual processes lead to increased difficulties if there are reruns or disputes. There will also have to be corresponding changes in customers settlement systems. As for MRTU systems, the Settlements Department's preliminary assessment is that the additional programming in SaMC can be accommodated without a change order. Nonetheless, the ISO will continue to incur ongoing administrative costs to manage deviations within each interval in real time, and these costs will not be reduced by subsequent offsetting deviations that will result in reduced GMC charges to the Proponents.

Attachment 1 – *Intermittent Resources Consensus Proposal and Tariff Revision Filing*, memorandum to ISO Board