

Market Monitoring Report

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Market Monitoring Report

DMM Report focused on three key issues:

- Compliance with Amendment 72 Load Forecast and Scheduling Requirements
- Generation Outage Reporting Requirements
- Preliminary analysis of Bid Insufficiency in Ancillary Service Markets during Summer 2006

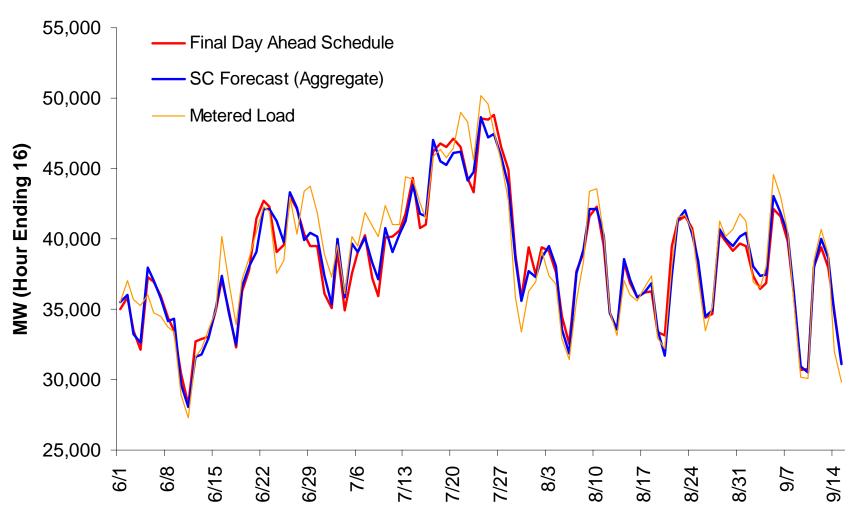


Compliance with Amendment 72 Load Scheduling Requirements

- Two types of Compliance:
 - 1. Submittal of Day Ahead Forecasts & Weekly Summary Reports
 - Explicit penalties for non-compliance (\$500)
 - Enforced by DMM, subject to appeal to FERC
 - 2. 95% Day Ahead Scheduling Requirement
 - No explicit penalties in CAISO tariff
 - Subject to enforcement by FERC
 - DMM reports data relating to compliance to FERC
- Compliance with Informational Requirements
 - Virtually 100% since May 2006 (compared to 75% before DMM program)
- Compliance with 95% Scheduling Requirement:
 - Overall compliance very high & virtually 100% during peak hours.
 - Improved compliance since implementation of DMM reporting program
- SCs' load forecast data very accurate relative to actual metered load data
 - Slight tendency to under-forecast in very high load hours



Comparison of SC Forecasts, Schedules and Metered Loads (Hour Ending 16)





Generation Outage Reporting Requirements

- DMM supports proposed modifications to outage reporting requirements & SLIC reporting tools
- Compliance with 30 minute reporting requirement has improved slightly after July 11 filing to suspend penalties
- However, DMM cautions that:
 - Historically, about 25% forced outages not reported within 30 minute deadline under CAISO tariff
 - Penalties for non-compliance are substantial (reach \$5,000 for each occurrence after 3rd violation in 12 months)
 - DMM does not have discretion to reduce/eliminate penalty due to "mitigating circumstances" or other factors
 - DMM can only submit filing with FERC recommending a reduction of penalty
 - Absent improvement in compliance, cost impact and workload of penalties could be significant.