

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

California Independent System Operator Corporation)	Docket No. ER04-835-____
)	
Pacific Gas and Electric Company)	
)	
v.)	
)	
California Independent System Operator Corporation)	Docket No. EL04-103-____ (consolidated)
)	

**SUPPLEMENTAL COMPLIANCE FILING
OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation (“CAISO”) respectfully submits this supplemental compliance filing pursuant to the Commission’s August 28, 2019 “Order on Rehearing”,¹ the CAISO’s October 28, 2019 compliance filing in these proceedings, and the Commission’s February 12, 2020 “Order Denying Motion For Stay”.² In its Order on Rehearing, the Commission granted the CAISO’s rehearing request, and accepted the CAISO’s 2013 and 2014 informational reports and its plans for invoicing the resettlements and then invoicing interest on the resettlements.³ The CAISO published

¹ *Order on Rehearing and Clarification*, 168 FERC ¶ 61,127 (2019) (“Order on Rehearing”), which granted the CAISO’s request for rehearing of the Commission’s *Order on Informational Refund Report, Complaint, and Informational Filing*, 157 FERC ¶ 61,033 (2016).

² *Order Denying Motion For Stay*, 170 FERC ¶ 61,094 (2020).

³ Order on Rehearing at PP 12-29.

settlement statements and invoices on June 19, 2014 but held off from invoicing interest in light of ongoing litigation regarding whether the CAISO was obligated to resettle the market and, if so, whether interest should apply. The Order on Rehearing resolved these issues and directed the CAISO to apply interest.

As discussed further below, the CAISO has calculated the interest on the minimum load cost adjustments through March 31, 2020, and plans to publish settlement statements and invoices on March 31, 2020 and perform market clearing on April 6, 2020.⁴ The interest on the minimum load adjustments constitutes the majority of the interest on the reallocated must-offer cost amounts at issue in these proceedings.

However, the CAISO requires additional time to calculate interest on reallocated start-up costs. The CAISO therefore plans to submit a further supplemental filing March 31, 2020 to update the Commission and the parties on the status of the CAISO's efforts to document the interest on the start-up costs and to propose a timeline for issuing settlement statements and invoices.

I. Background

In its December 20, 2013, "Informational Refund Report of the California Independent System Operator Corporation" ("December 2013 Report"), the CAISO provided the Commission and the parties with a detailed summary of the resettlement issues in these proceedings, the applicable effective date for each resettlement issue based on the underlying orders in the proceedings, and a

⁴ These settlement statements and invoices will also include interest on the resettlement adjustments directed by the Commission in Docket No. ER08-760 that were included with the Amendment No. 60 resettlements processed in 2014.

summary of the estimated total amount of the resettlement for each issue along with a grand total.⁵ The December 2013 Report estimated that the CAISO would be reallocating a total of \$197.6 million in must-offer costs (not including interest) in response to the Commission's directives in this proceeding. The majority of that total estimated amount consisted of minimum load costs and the balance (\$24.8 million) consisted of start-up costs.⁶ The CAISO originally planned to invoice interest separately within 30 days of invoicing the underlying resettlements.⁷

As explained in the December 2013 Report, the CAISO filed Amendment No. 60 to its tariff in this proceeding, in 2004, to change the allocation of minimum load costs, and proposed no changes with respect to start-up or emissions costs.⁸ In 2006, however, the Commission directed the CAISO to allocate start-up and emissions costs the same way as minimum load costs.⁹ To comply with the Commission's directive, the CAISO had to develop rates to collect sufficient funds to reimburse suppliers for the start-up and emissions costs. These rates were no longer in place as of April 1, 2009, when the CAISO implemented its current market design.

⁵ For ease of reference, the December 2013 Report is provided in Attachment A hereto.

⁶ December 2013 Report at 3-8, 10, and attachments thereto. No emissions costs were charged or allocated to the market during the refund period. Therefore, there are no emissions costs to reallocate. *Id.* at 5.

⁷ *Id.* at 10-11.

⁸ *Id.* at 4.

⁹ *Id.* (citing *Cal. Indep. Sys. Operator Corp.*, Opinion No. 492, 117 FERC ¶ 61,348, at P 98 (2006)).

On May 12, 2014, the CAISO filed an updated “Informational Report of the California System Operator Corporation Concerning Status of Settlement Adjustments” (“May 2014 Report”) with an updated recalculation. In the May 2014 Report, the CAISO reported a total resettlement amount of \$217 million. The increase from the total estimated amount in the December 2013 Report resulted from corrections and dispute resolution regarding the allocation of minimum load costs related to Miguel and South of Lugo commitments from a local to a zonal allocation.¹⁰ Further, the May 2014 Report explained that the CAISO planned to invoice the resettlement adjustments on June 16, 2014 and planned to clear the market on June 26, 2014.¹¹ The CAISO issued Amendment No. 60 settlement statements on June 19, 2014 and performed market clearing on June 26, 2014. The May 2014 Report also stated that the CAISO intended to invoice interest, subject to Commission directives issued in response to pending protests.¹²

II. Interest Calculations

In response to the Commission’s directive in its Order Denying Motion for Stay, the CAISO has calculated the interest on the minimum load cost adjustments, using the applicable quarterly interest rates determined pursuant to section 35.19a of the Commission’s regulations.¹³ These amounts include interest on the unpaid interest for the minimum load adjustments made in 2014

¹⁰ May 2014 Report at 2 and attachment A thereto.

¹¹ *Id.* at 2.

¹² *Id.*

¹³ 18 C.F.R. § 35.19a.

and additional interest on the unpaid interest from June 2014 through March 31, 2020. The minimum load cost adjustments constitute the majority of the must-offer cost amounts that have been reallocated in these proceedings. Therefore, the interest on the minimum load adjustments also constitutes the majority of the interest on the reallocated must-offer cost amounts. The interest amounts that the CAISO has calculated for minimum load cost adjustments total \$88.3 million.

With respect to the calculation of start-up costs, the CAISO requires further time to calculate interest. As the CAISO explained in its December 3, 2019 answer filed in this proceeding, the CAISO must manually reconstruct settlement statements used in interest calculations, because the software system that was used to create the original statements is no longer available. This task is further complicated due to data accessibility issues that do not exist with respect to the minimum load data. The start-up cost data needs to be reconstructed from archived data, whereas the minimum load data was comparatively much more accessible. Further, it is noteworthy that the CAISO has not worked with the start-up cost data in more than five years (since June 2014), that data is between 10 and 15 years old, and subject matter experts primarily responsible for the data have retired or are no longer working in settlements. Finally, with respect to start-up costs, in order to comply with the Commission's directive that those costs be allocated in the same manner as minimum load costs, the CAISO needed to rely on estimated cost data.¹⁴

¹⁴ See December 2013 Report at 4.

Due to these and other challenges involved in dealing with data and systems going back over fifteen years, it is taking the CAISO longer than originally estimated to resolve the issue of interest on start-up costs. However, because the CAISO indicated in its December 3 answer that it planned to submit a supplemental filing by the beginning of March 2020, the CAISO determined that it should separately provide interest calculations on the reallocation of minimum load costs at this time. The CAISO intends to submit a further supplemental compliance filing March 31, 2020 to address the matter of interest on reallocated start-up costs. To the extent necessary, the CAISO respectfully requests Commission authorization for additional time to submit a further supplemental compliance filing by March 31, 2020. This further compliance filing will include a target time-line for issuing settlement statements and invoices for start-up costs.

III. Timeline for Interest Settlement

The CAISO has calculated interest through March 31, 2020 to be charged and allocated for minimum load cost adjustments, which totals \$88.3 million. The CAISO has provided each market participant with specific details regarding its interest charges and allocations for those amounts. The CAISO plans to invoice these amounts on March 31, 2020 and to clear the market on April 6, 2020. The CAISO will be performing outreach to affected scheduling coordinators to provide each of them with their scheduling coordinator-specific data. In addition, the CAISO will be scheduling a conference call to respond to any questions.

Respectfully submitted,

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March 2, 2020

Attachment A

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

California Independent System Operator Corporation)	Docket No. ER04-835-____
)	
Pacific Gas and Electric Company)	
)	
v.)	
)	
California Independent System Operator Corporation)	Docket No. EL04-103-____ (consolidated)
)	

**INFORMATIONAL REFUND REPORT OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation (“ISO”) respectfully submits this informational refund report regarding resettlements to be made in compliance with the Commission’s orders, in the above referenced dockets. Although the Commission did not require a refund report, the ISO is filing this report to provide transparency to interested parties regarding the ISO’s payment of interest on the refunds. No Commission action is required in response to this informational filing in the absence of a protest or request for clarification.¹

¹ It has come to the ISO’s attention that some parties may not agree with the ISO’s plan for applying interest to the amounts to be reallocated. See Section III below, discussing the ISO’s proposal for applying interest.

I. Background

Amendment No. 60 to the ISO tariff proposed three separate cost allocation methodologies for must-offer minimum load cost compensation according to whether the ISO had committed the must-offer generation in response to a system, zonal, or local reliability need. When a unit committed for a local need also served a system need, Amendment No. 60 charged only the incremental costs (*i.e.*, the amount by which the minimum load cost of the unit exceeded the minimum load cost of the unit that would have been committed to serve the system need) to the local “bucket.”

The Commission approved Amendment No. 60, subject to refund, to be effective ten days after the ISO published a market notice that it was implementing a previously announced set of new market software enhancements.² Amendment No. 60 became effective on October 1, 2004. In the same order, however, the Commission set for hearing a PG&E complaint regarding allocation of must-offer costs, with a refund effective date of July 17, 2004.³

In Opinion No. 492, issued in December 2006, the Commission approved the Amendment No. 60 methodology, with modifications, effective on the refund effective date of July 17, 2004.⁴ In addition to the revised effective date, the Commission directed the following modifications: (1) exemption of wheel-through

² *Cal. Indep. Sys. Operator Corp.*, 108 FERC ¶ 61,022 (2004).

³ *Id.*

⁴ *Cal. Indep. Sys. Operator Corp.*, 117 FERC ¶ 61, 348 (2006) (“Opinion No. 492”), *on reh’g* 121 FERC ¶ 61,193 (2007).

transactions from system must-offer charges; (2) application of the Amendment No. 60 cost allocation methodology to start-up costs and emissions costs; and (3) a classification of must-offer waiver denials (*i.e.* commitments) to address the Miguel constraint as zonal rather than local.⁵ In its November 2007 order on rehearing, the Commission concluded that must-offer waiver denials (*i.e.* commitments) to address the South-of-Lugo constraint should also be classified as zonal rather than local.⁶

In addition, the Commission authorized the use of the ISO's "proxy" methodology to calculate the incremental cost of meeting the local reliability need for unit commitments that meet both system and local needs during the period in which the security constrained unit commitment procedure was unavailable.⁷

The ISO made two compliance filings, one after Opinion No. 492 in February 2007, and one after the Rehearing Order in December 2007. On September 16, 2011, the Commission issued two orders: the Compliance Order and an order denying rehearing.⁸ The U.S. Court of Appeals for the D.C. Circuit denied a petition for review of the Commission's orders on November 5, 2013.⁹

II. Refunds

The ISO has calculated four types of refunds necessitated by the Commission's orders:

A. Start-up and emissions costs.

⁵ *Id.* PP 31, 90, 96.

⁶ *Cal. Indep. Sys. Operator Corp.*, 121 FERC ¶ 61,193 (2007) ("Rehearing Order").

⁷ *Id.* at P 82.

⁸ *Cal. Indep. Sys. Operator Corp.*, 136 FERC ¶ 61,197 (2011.).

⁹ *See City of Anaheim*, ____ Fed. Appx. ____, 2013 WL 5964981 (D.C. Cir. 2013).

Although Amendment No. 60 as filed was limited to the allocation of minimum load cost compensation, the Commission ruled that the ISO should allocate start-up costs and emissions costs in the same manner.¹⁰ The ISO has therefore reallocated those costs according to the final Commission-approved methodology (*i.e.*, with the Commission's modifications) from July 17, 2004, through March 31, 2009 (the date the ISO implemented its new market design, which terminated the pre-existing must-offer obligation and cost allocation). The ISO used estimated cost data as authorized by the Commission.¹¹

For the period July 2004 to November 2007, the ISO collected start-up costs from Scheduling Coordinators based upon in-state metered load within the ISO Control Area, plus real time gross export to other in-state control areas multiplied by the start-up cost recovery rate. In the Rehearing Order, the Commission authorized the ISO to use “estimated” start-up and emissions costs and allocate the costs using the same allocation methodology as minimum load cost compensation. Beginning December 1, 2007, the ISO collected start-up costs according to the methodology that the Commission approved for minimum load cost compensation, as discussed below.

For the period of July 1, 2004 through December 31, 2007, the ISO is reallocating \$24.8 million in start-up costs according to the methodology that the Commission approved for minimum load cost compensation and issuing refunds and surcharges accordingly. Of those amounts, \$11 million is allocated zonally,

¹⁰ Opinion No. 492 at P 98.

¹¹ Rehearing Order at P 63.

\$8.5 million is attributed to system needs, and the remaining \$5.3 million is local. This information is provided in Attachment 1.

No emissions costs were charged or allocated to the market during the refund period. Therefore, there are no emissions costs to reallocate.

B. Revised Effective Date for Allocation of Minimum Load Costs.

As noted, the Commission made the new methodology retroactively effective on the July 14, 2004 refund effective date. Because Amendment No. 60 was originally in effect prior to October 1, 2004, the ISO originally allocated minimum load cost compensation costs between June 17, 2004 and September 30, 2004 according to the prior methodology (to control area gross load). To implement the new effective date, the ISO is reallocating those costs from July 17, 2004, to September 30, 2004, according to the final Amendment No. 60 methodology,¹² with one exception. Because the ISO did not implement its security constrained unit commitment software until October 1, 2004, it is unable to use it to calculate the incremental cost of local for commitments that meet both system and local needs during the period prior to that date using that software. Instead, pursuant to the Commission's authorization on rehearing, the ISO is using a proxy methodology to calculate the incremental-cost-of-local for the period in which security constrained unit commitment functionality was unavailable.¹³ In addition, where records indicate that there were two reasons for a must-offer waiver denial, one local and one zonal, the costs were split 50-50.

¹² The final methodology would be the methodology in use from October 1, 2004, adjusted for wheel-throughs and Miguel and South-of-Lugo, as discussed in paragraphs 3 and 4.

¹³ *Id.* at P 82.

Under the final approved methodology, the ISO allocates minimum load compensation costs as follows:

- Costs incurred because of Control Area wide need are first allocated according to net negative uninstructed deviations as a Tier 1 allocation. The ISO derives a maximum rate for these charges by dividing the total minimum load costs by the minimum load.
- If the Tier 1 charges exceed the maximum rate, the ISO allocates the excess to metered demand and exports from the ISO to other Control Areas within California.
- Costs incurred to meet local reliability need due to a constraint on a transmission component that is not part of a defined active inter-zonal interface are allocated to the associated Participating Transmission Owner in a reliability service costs charge.
- If the must offer unit meeting local needs was also meeting system needs, the ISO calculates an incremental cost by comparing the cost of that unit to the cost associated with the more economic unit that could have been dispatched to meet the system needs had there been no Local Area Need. Only the incremental cost is charged to the Participating Transmission Owner. The ISO allocates the costs of the more economic unit according to the Tier 1 allocation for system needs.
- Costs incurred to provide zone-wide benefits, or to manage Inter-Zonal Congestion are allocated to demand in the affected zone.

For the period of July 17, 2004, to September 30, 2004, the ISO re-allocated minimum load costs totaling \$73.6 million. The Tier 1 allocation is \$3.8 million; the total charge to reliability service costs is \$835, 000; and the total charge to Inter-Zonal Congestion is \$69 million. These amounts are described in Attachment 2.

C. Wheel-Throughs.

The filed Amendment No. 60 methodology included wheel-throughs in the allocation of the system “bucket” because wheel-throughs include exports. The Commission rejected the inclusion of wheel-throughs in the allocation of the

system bucket.¹⁴ The ISO therefore reallocated system minimum load cost compensation costs from July 17, 2004, to March 31, 2009, to exclude wheel-throughs.

For the period between July 17, 2004 and March 31, 2009, there was one instance in April 2006 where minimum load cost exceeded the cap rate in Tier 1 allocation for System Needs resulting in an allocation to metered demand and exports. Under the reallocations discussed in this report, the associated minimum load costs for April 2006 have been re-classified as a zonal area need. Therefore, the costs are re-allocated zonally to metered demand which exclude exports.

D. Miguel and South-of-Lugo.

Under the proposed and originally implemented Amendment No. 60 methodology, the ISO classified must-offer waiver denials to address the Miguel and South-of-Lugo constraints as local. The Commission concluded that they should be treated as zonal constraints.¹⁵ The ISO is therefore reallocating Minimum Load Compensation costs from July 17, 2004, to March 31, 2009, to include Miguel and South-of-Lugo constraints in the zonal category. The effect of the reclassification of the Miguel and South-of-Lugo from local to zonal constraints results in costs previously allocated as local or system (for local commitments that also service a system need) to be allocated as zonal. Affected scheduling coordinators will receive refunds for system costs and local costs and will receive charges for zonal costs.

¹⁴ Opinion No. 492 at P 90.

¹⁵ *Id.* at P 31, Rehearing Order at P 25.

For the period October 1, 2004 through March 31, 2009 the refund amount to scheduling coordinators for system costs is \$7.8 million, the total refund amount to scheduling coordinators for local costs is \$91.3 million. Consequently, \$99.1 million dollars was charged to scheduling coordinators as zonal costs. These amounts are described in Attachment 3.

III. Interest

In calculating refunds amounts and the corresponding surcharges to collect the refunds, the ISO needed to address whether interest and corresponding surcharges must be included. The Commission's orders did not direct the ISO to include interest. Commission regulations, however, provide some guidance when interest must be included:

The public utility whose proposed increased rates or charges were suspended shall refund at such time in such amounts and in such manner as required by final order of the Commission the portion of any increased rates or charges found by the Commission in that suspension proceeding not to be justified, together with any interest as required in paragraph (a)(2) of this section.¹⁶

18 C.F.R. § 35.19a. The U.S. Court of Appeals for the D.C. Circuit has ruled that, under section 35.19a, refunds are mandatory. See, *Michigan Gas. Co. v. FERC*, 133 F.3d 34 (D.C. Cir. 1998). Although 18 C.F.R. § 35.19a does not mention surcharges, surcharges that result from the Amendment No. 60 resettlement are the necessary correlate to refunds. Absent interest on the surcharges, the ISO, which is revenue neutral, would have to collect the interest paid on the refunds from the market as a whole instead of from those who have

¹⁶ Section 35.19a (a)(2) specifies that interest accrues from the date of collection until the date refunds are made and also specifies the applicable FERC interest rate.

had the benefit of the time value of the uncollected charges. The ISO has concluded that this would be contrary to the Commission's general policies and will pay and charge interest accordingly.¹⁷

The Amendment No. 60 proceeding, however, involved not only Amendment No. 60 itself, but also Pacific Gas and Electric Company's complaint. Yet, Section § 35.19a applies only to rates that the Commission has suspended. In *New England Power Pool*,¹⁸ the Commission ruled on a request for clarification regarding a rate for black start services that it had accepted without suspension and had made retroactive to the date when the services were being supplied – even though no rate was yet on file. One party requested clarification that interest should apply to the retroactive payment. The Commission noted that its original order was silent as to interest and no party had sought rehearing. It denied the request as an untimely request for rehearing.

Louisiana Public Service Commission v. Entergy Corp.,¹⁹ was a complaint proceeding. The Commission had initially concluded it could not provide refunds. The complainant sought review, and the U.S. Court of Appeals reversed the Commission.²⁰ On remand, the Commission ordered refunds but did not mention interest. The complainant filed a motion, seeking interest. The Commission concluded that the motion was an untimely request for rehearing. It went on to state:

¹⁷ See, e.g., *Cambridge Elec. Light Co.*, 66 FERC 61,346 (1994) *r'heg denied* 67 FERC 61,368 (1994); *Consol. Gas Supply Corp.*, 23 FERC 61,018 at p. 61,048 (1983).

¹⁸ 95 FERC ¶ 61,449 (2001).

¹⁹ 124 FERC ¶ 61,275 (2008).

²⁰ *La. Pub. Serv. Comm'n v. FERC*, 482 F.3d 510 (D.C. Cir. 2007).

Our finding here is consistent with *New England Power Pool* . . . where we denied a request for interest in a case where the earlier order did not order interest, *i.e.*, was silent as to the ordering of interest and the petitioner did not file a timely request for rehearing challenging this aspect of the earlier order. Finally, we see nothing in the language of section 35.19a of our regulations that would dictate a contrary result, *i.e.*, that would require interest in any and all cases decided by the Commission.²¹

The Commission did not mention interest in its orders on Amendment No. 60.

As noted, Amendment No. 60 involved both a section 205 filing in which the Commission suspended the rate and made it effective subject to refund on October 1, 2004, and a complaint with a refund effective date of July 17, 2004. From this the ISO has concluded that interest is not applicable to the period from July 17, 2004, to September 30, 2004, but is applicable from October 1, 2004, to March 30, 2009.

IV. Results of the ISO's Refund Calculations.

In total, the ISO will be reallocating \$197.6 million in response to the Commission's directives in this proceeding. This amount does not include interest, which will be invoiced separately, as discussed below.

V. Timeline for Providing Refunds

The ISO plans to provide scheduling coordinators with settlement statements on December 20, 2013. The settlement statements will include other resettlement amounts in addition to Amendment 60, including refunds directed by the Commission in Docket No. ER08-760, which is the subject of a separate refund report submitted in that docket. The ISO plans to publish invoices on February 4, 2013. These invoices will not include interest. The ISO plans to

²¹ 124 FERC ¶ 61,275 at P 40.

invoice interest in a separate invoice within 30 days—by March 6—from the market clearing of the \$197.6 million.

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December 20, 2013

Amendment 60
Start-Up Cost Recovery Re-allocation Summary

Trade Month	Reversal CT 592: Start-Up Cost Recovery	New CT 5927: Start-Up Cost Recovery Tier 1 Allocation	New CT 5928: Start-Up Cost Recovery Reliability Service Cost Allocation	New CT 5929: Start-Up Cost Recovery Inter-Zonal Congestion Allocation
7/31/2004	\$ (438,908.42)	\$ 23,183.32	\$ 1,362.02	\$ 414,363.05
8/31/2004	\$ (440,427.84)	\$ 11,661.89	\$ 1,865.70	\$ 426,900.24
9/30/2004	\$ (417,110.55)	\$ 34,716.67	\$ 11,368.70	\$ 371,025.18
10/31/2004	\$ (366,172.58)	\$ 16,456.12	\$ 225,715.35	\$ 124,001.14
11/30/2004	\$ (351,735.42)	\$ 14,973.29	\$ 118,915.98	\$ 217,882.81
12/31/2004	\$ (379,043.59)	\$ 12,991.64	\$ 83,745.51	\$ 282,306.41
1/31/2005	\$ (370,395.15)	\$ 33,557.84	\$ 178,715.66	\$ 158,084.70
2/28/2005	\$ (321,704.58)	\$ 35,902.21	\$ 83,868.38	\$ 201,933.98
3/31/2005	\$ (348,962.54)	\$ 99,977.76	\$ 160,383.18	\$ 88,601.58
4/30/2005	\$ (340,815.92)	\$ 55,484.81	\$ 238,059.92	\$ 47,271.17
5/31/2005	\$ (372,415.59)	\$ 59,661.01	\$ 251,864.66	\$ 60,889.94
6/30/2005	\$ (382,461.06)	\$ 32,776.84	\$ 90,490.29	\$ 259,193.85
7/31/2005	\$ (472,598.37)	\$ 178,642.18	\$ 59,452.87	\$ 234,456.04
8/31/2005	\$ (466,261.35)	\$ 85,885.26	\$ 46,020.00	\$ 334,355.95
9/30/2005	\$ (394,264.38)	\$ 69,627.10	\$ 24,562.67	\$ 300,074.61
10/31/2005	\$ (688,722.47)	\$ 46,902.06	\$ 46,764.26	\$ 594,987.37
11/30/2005	\$ (645,722.37)	\$ 36,031.33	\$ 12,333.30	\$ 597,357.82
12/31/2005	\$ (665,273.14)	\$ 21,887.49	\$ 175,565.58	\$ 467,820.11
1/31/2006	\$ (650,549.49)	\$ 34,414.06	\$ 48,465.94	\$ 567,669.47
2/28/2006	\$ (580,610.26)	\$ 14,515.29	\$ 25,837.14	\$ 540,257.41
3/31/2006	\$ (641,349.19)	\$ 16,739.24	\$ 111,723.03	\$ 512,822.80
4/30/2006	\$ (606,027.18)	\$ 21,210.91	\$ 184,111.06	\$ 400,709.56
5/31/2006	\$ (677,676.72)	\$ 31,986.34	\$ 106,056.41	\$ 539,701.72
6/30/2006	\$ (758,292.46)	\$ 301,952.15	\$ 261,307.58	\$ 195,032.80
7/31/2006	\$ (891,180.32)	\$ 344,886.77		\$ 546,293.56
8/31/2006	\$ (798,940.85)	\$ 150,280.80	\$ 83,249.64	\$ 565,410.43
9/30/2006	\$ (739,647.57)	\$ 144,675.06	\$ 100,148.28	\$ 494,824.25
10/31/2006	\$ (671,349.12)	\$ 671,349.14		\$ -
11/30/2006	\$ (645,590.35)	\$ 645,590.42		\$ -
12/31/2006	\$ (681,178.58)	\$ 149,995.53	\$ 531,183.06	\$ -
1/31/2007	\$ (699,004.12)	\$ 254,437.48	\$ 444,566.62	\$ -
2/28/2007	\$ (613,416.47)	\$ 256,040.00	\$ 248,923.06	\$ 108,452.05
3/31/2007	\$ (680,983.26)	\$ 218,731.87	\$ 462,251.44	\$ -
4/30/2007	\$ (663,172.97)	\$ 550,831.46		\$ 112,341.48
5/31/2007	\$ (718,828.69)	\$ 718,828.74		\$ -
6/30/2007	\$ (738,949.54)	\$ 624,707.94	\$ 22,464.07	\$ 91,851.45
7/31/2007	\$ (845,887.87)	\$ 292,761.77		\$ 553,120.58
8/31/2007	\$ (868,613.03)	\$ 741,621.76		\$ 126,991.26
9/30/2007	\$ (752,206.70)	\$ 752,206.75		\$ -
10/31/2007	\$ (695,037.64)	\$ 28,913.54	\$ 256,399.39	\$ 409,724.69
11/30/2007	\$ (650,693.07)	\$ 181,087.89	\$ 394,515.21	\$ 75,089.97
12/31/2007	\$ (691,751.62)	\$ 465,825.59	\$ 225,926.08	\$ -
Grand Total	\$ (24,823,932.39)	\$ 8,483,909.32	\$ 5,318,182.04	\$ 11,021,799.43

**Minimum Load Cost Compensation (MLCC) Re-allocation
July 17, 2004 through September 30, 2004**

Trade Month	Reversal CT 595: Minimum Load Cost Allocation	New CT 1697: Tier 1 MLCC Allocation for System Needs	New CT 1698: Allocation of MLCC for Reliability Service Costs for Local Needs	New CT 1699: Allocation of MLCC for Inter-Zonal Congestion for Zonal Needs
07/31/04	\$ (18,441,202.47)	\$ 973,487.72	\$ 55,324.44	\$ 17,412,390.31
08/31/04	\$ (30,304,459.68)	\$ 781,548.16	\$ 124,096.33	\$ 29,398,815.19
09/30/04	\$ (24,908,848.83)	\$ 2,063,049.00	\$ 655,328.83	\$ 22,190,470.99
Grand Total	\$ (73,654,510.98)	\$ 3,818,084.88	\$ 834,749.60	\$ 69,001,676.49

Amendment 60
Minimum Load Cost Compensation (MLCC) Re-allocation

Trade Month	Reversal CT 1691: Minimum Load Cost Neutrality Allocation	Reversal CT 1697: Tier 1 MLCC Allocation for System Needs	Reversal CT 1698: Allocation of MLCC for Reliability Service Costs for Local Needs	New CT 1699: Allocation of MLCC for Inter-Zonal Congestion for Zonal Needs	Reversal CT 1797: Tier 1 MLCC Allocation of Resource Adequacy for System Needs	Reversal CT 1798: Allocation of Reliability Service Costs attributed to MLCC for Resource Adequacy for Local Needs	New CT 1799: Allocation of MLCC for Inter-Zonal Congestion for Resource Adequacy for Zonal Needs
10/31/04		\$ (20,234.63)	\$ (956,194.76)	\$ 976,429.40			
11/30/04		\$ (0.00)	\$ (511,332.74)	\$ 511,332.74			
12/31/04		\$ (370,127.46)	\$ (10,949,556.00)	\$ 11,319,683.46			
01/31/05		\$ (11,140.45)	\$ (122,998.02)	\$ 134,138.47			
02/28/05		\$ (218,577.42)	\$ (1,267,146.27)	\$ 1,485,723.68			
03/31/05		\$ (62,996.21)	\$ (343,142.40)	\$ 406,138.61			
04/30/05		\$ (14,149.97)	\$ (141,823.24)	\$ 155,973.22			
05/31/05		\$ (386,623.46)	\$ (987,608.23)	\$ 1,374,231.69			
06/30/05		\$ (1,242,003.91)	\$ (4,009,249.38)	\$ 5,251,253.30			
07/31/05		\$ (498,718.73)	\$ (8,920,741.32)	\$ 9,419,460.05			
08/31/05		\$ (100,768.12)	\$ (10,158,921.07)	\$ 10,259,689.19			
09/30/05		\$ (659,527.55)	\$ (3,558,020.66)	\$ 4,217,548.21			
10/31/05		\$ 52,476.59	\$ (3,359,572.74)	\$ 3,307,096.15			
11/30/05		\$ 0.00	\$ -	\$ (0.00)			
12/31/05		\$ 0.00	\$ -	\$ (0.00)			
01/31/06		\$ (419,236.64)	\$ (5,694,974.78)	\$ 6,114,211.42			
02/28/06		\$ (17,174.86)	\$ (6,047,946.29)	\$ 6,065,121.15			
03/31/06		\$ 29,148.94	\$ (7,152,109.57)	\$ 7,122,960.63			
04/30/06	\$ (245,931.28)	\$ 179,211.28	\$ (13,574,985.74)	\$ 13,641,705.74			
05/31/06		\$ (0.00)	\$ -	\$ 0.00			
06/30/06		\$ -	\$ -	\$ 0.00	\$ (347,610.38)	\$ (754,328.81)	\$ 1,101,939.19
07/31/06		\$ (2,311.54)	\$ (276,558.27)	\$ 278,869.81	\$ (538,683.62)	\$ (2,119,914.91)	\$ 2,658,598.53
08/31/06		\$ (13,336.36)	\$ (15,678.28)	\$ 29,014.64	\$ (583,852.92)	\$ (2,231,836.94)	\$ 2,815,689.87
09/30/06			\$ -	\$ (0.00)	\$ (278,463.02)	\$ (435,699.66)	\$ 714,162.68
10/31/06					\$ (23,521.52)	\$ (109,773.69)	\$ 133,295.21
11/30/06					\$ (22,519.06)	\$ (89,353.15)	\$ 111,872.21
12/31/06			\$ -	\$ (0.00)	\$ (0.00)	\$ -	\$ 0.00
01/31/07			\$ -	\$ (0.00)	\$ (0.00)	\$ -	\$ (0.00)
02/28/07			\$ -	\$ 0.00	\$ 0.00	\$ -	\$ (0.00)
03/31/07			\$ -	\$ (0.00)	\$ (0.00)	\$ -	\$ (0.00)
04/30/07				\$ (0.00)	\$ 0.00	\$ -	\$ (0.00)
05/31/07					\$ (29,547.39)	\$ (25,812.94)	\$ 55,360.33
06/30/07			\$ 0.00	\$ (0.00)	\$ (382,019.13)	\$ (1,384,785.33)	\$ 1,766,804.46
07/31/07				\$ (0.00)	\$ (315,598.94)	\$ (1,411,074.74)	\$ 1,726,673.68
08/31/07		\$ 1,020.35	\$ (57,736.07)	\$ 56,715.72	\$ (380,905.93)	\$ (1,049,812.77)	\$ 1,430,718.70
09/30/07					\$ (102,774.52)	\$ (861,804.85)	\$ 964,579.37
10/31/07			\$ -	\$ 0.00	\$ (273,014.63)	\$ (989,906.13)	\$ 1,262,920.76
11/30/07		\$ (1,163.99)	\$ (65,015.54)	\$ 66,179.52	\$ (109,065.41)	\$ (388,011.31)	\$ 497,076.73
12/31/07			\$ -		\$ (1,338.51)	\$ (24,781.83)	\$ 26,120.34
01/31/08					\$ (1,341.27)	\$ (43,540.51)	\$ 44,881.78
02/29/08					\$ 0.00	\$ 0.00	\$ 0.00
03/31/08					\$ 0.00	\$ 0.00	\$ (0.00)
04/30/08					\$ (158,469.33)	\$ (110,387.97)	\$ 268,857.29
05/31/08					\$ (165,254.18)	\$ (622,007.23)	\$ 787,261.41
06/30/08					\$ (43,804.97)	\$ (210,953.35)	\$ 254,758.31
07/31/08					\$ (0.00)	\$ 0.00	\$ 0.00
08/31/08					\$ (0.00)	\$ (0.00)	\$ (0.00)
09/30/08					\$ (12,272.30)	\$ (65,769.75)	\$ 78,042.05
10/31/08					\$ 0.00	\$ (0.00)	\$ (0.00)
11/30/08					\$ (26,098.04)	\$ (90,658.01)	\$ 116,756.05
12/31/08					\$ (5,291.92)	\$ (90,077.16)	\$ 95,369.09
01/31/09					\$ (0.00)	\$ 0.00	\$ (0.00)
02/28/09					\$ (5,437.48)	\$ (16,584.75)	\$ 22,022.24
03/31/09					\$ 0.00	\$ 0.00	\$ (0.00)
Grand Total	\$ (245,931.28)	\$ (3,776,234.15)	\$ (78,171,311.38)	\$ 82,193,476.80	\$ (3,806,884.48)	\$ (13,126,875.79)	\$ 16,933,760.27

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing document to be served upon each person designated on the official service lists compiled by the Secretary in these proceedings.

Dated at Washington, D.C. this 2nd day of March, 2020.

/s/ Daniel Klein

Daniel Klein

Davis Wright Tremaine LLP