- MEMORANDUM -

Rules of Conduct questions regarding the Draft Final Proposal for the Settlement Process Timeline Change Initiative

During the Stakeholder Conference Call on Thursday, June 16th, 2011 to discuss the draft Final Proposal for the Settlement Process Timeline Change Initiative, questions were raised regarding two Rules of Conduct related items for which the ISO is now publishing clarifying information.

The first item related to whether the penalty for Late or Inaccurate Actual Settlement Quality Meter Data (SQMD) should be levied per Trade Date or per Resource_ID per Trade Date. The ISO is clarifying that the ISO position is that the sanction would be levied per Trade Date. Thus, if a Scheduling Coordinator (SC) fails to submit Actual SQMD for at least (1) of their scheduled Resources_IDs for a given trade date, a $1,000 penalty will apply. If an SC fails to submit Actual SQMD for multiple Resources_IDs for a given Trade Date, then the penalty will still be $1,000. In an SC revises their Actual SQMD after T+48B, for one or more of their Resources_IDs for a given Trade Date, a $1,000 penalty will apply.

The second item related to whether a penalty would be calculated for each submission of SQMD during the T+168B to T+172B window or only once for each Trade Date for which a change is submitted regardless of the number of times a change that Trade Date is submitted by a Scheduling Coordinator during the window. The ISO is clarifying that the ISO position is that the penalty would be assessed once per Trade Date regardless of the number of times data is submitted for a given Trade Date during the submittal window from T+168B to T+172B. Thus, regardless of whether an SC submits data once or multiple times for a given Trade Date during the submittal window, the sanction amount would be $1,000.

Please submit comments regarding the draft Final Proposal by COB on June 23rd, 2011 to the SPTC@caiso.com mailbox.