



651 Commerce Drive
Roseville, CA 95678

phone (916) 781-3636
fax (916) 783-7693
web www.ncpa.com

Comments of Northern California Power Agency 2010 GMC Extension Tariff Modifications

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Comments Submitted By: Tony Zimmer
tony.zimmer@ncpa.com
916-781-4229

Comments

Northern California Power Agency (NCPA) provides these comments on the CAISO proposed 2010 GMC Extension Tariff Modifications.¹ These comments are focused only on the language included in CAISO Tariff Appendix F, Schedule 1, Part A, and are not focused on the concepts described by the language. Lack of comment regarding the proposed concept of how the Market Usage Forward Energy charge is calculated should not be interpreted as support for the CAISO proposal. NCPA will provide separate comments to CAISO regarding the proposed concept for calculating the Market Usage Forward Energy charge.

NCPA believes the revised language included within Part A is confusing. Part A includes a description of how the rate in \$/MWh for the Market Usage Charge is derived. NCPA recommends that the proposed language found in CAISO Tariff Appendix F, Schedule 1, Part A, subsection 7, be changed to the following:

...The MWh quantity used to develop a Market Usage Charge rate will be calculated separately for two sets of CAISO Markets: (i) the MWh quantity used to develop the Ancillary Services and RTM rate will be based on the sum of forecasted MWh of purchases and sales of Ancillary Services in the DAM, the HASP, and the RTM, MWh of Instructed Imbalance Energy, and MWh of Uninstructed Imbalance Energy netted over the Settlement Interval; and (ii) the MWh quantity used to develop the rate for the Day-Ahead market for Energy will be based on the sum of forecasted MWh of Energy purchases or sales of all Scheduling Coordinators, based on the greater amount of each Scheduling Coordinator's purchases or sales, in the DAM. For Scheduling Coordinators with both purchases and sales of Energy in the DAM, the rate for the Day Ahead Market for Energy will be based on the greater amount of MWh associated with either purchases or sales. For Scheduling Coordinators submitting Self Schedules, the rate for the Day Ahead market for Energy will be based on the greater amount of MWh associated with either supply or demand.

¹ Published 10/8/2009 at <http://www.caiso.com/2441/244195bd53670.pdf>