

Submitted By	Company	Date Submitted
Brian Theaker	NRG Energy, Inc. (“NRG”)	February 8, 2018

NRG submits these comments on the CAISO’s proposals to: use the CAISO’s proposal to use the Monday-only (“MO”) price published by the Intercontinental Exchange (“ICE”) in the Day-Ahead market the CAISO runs on Sunday for Monday when it is available, and, as the CAISO proposed in the January 31 update to the Draft Final Proposal, to use the ICE MO price in the CAISO’s Monday real-time market as well.<sup>1</sup>

NRG strongly supports these proposals and respectfully urges the CAISO to implement them as soon as possible.

In the separate initiative the CAISO conducted with regards to using the ICE MO price for the CAISO’s Sunday DA Market for Monday, the CAISO indicated that it would file at FERC the amendment to implement this change on January 31, 2019.<sup>2</sup> To NRG’s understanding, the CAISO has not yet made this filing. The fact that a significant portion of winter remains, coupled with recent gas market volatility resulting from colder than normal weather in the West, underscore the urgent need to file to implement the changes proposed in this amendment as soon as possible. NRG also requests that the CAISO ask FERC to waive the 60-day notice period to allow this amendment to take effect as soon as possible.

Finally, in the stakeholder call held on January 28, market participants asked the CAISO to identify the conditions under which the CAISO would **not** use the ICE MO price when it was available. While the CAISO then demurred, NRG respectfully requests the CAISO to clarify in its proposed amendment the conditions under which the CAISO would **not** use the ICE MO price when it was available.

Thanks for the opportunity to submit these comments.

---

<sup>1</sup> January 31, 2019 *Local Market Power Mitigation Enhancements Draft Final Proposal (Updated)* at page 47.

<sup>2</sup> *Use of More Updated Gas Price for Mondays in Temporary Day-Ahead Market White Paper* at page 1.