Roseville Electric
Reliable Energy • Dependable Service

2090 Hilltop Circle
Roseville, CA 95747
Office (916) 774-5600
FAX (916) 784-3797
TDD (916) 774-5220
www.RosevilleElectric.org

Questions/Comments on ISO Proposal for CRR Allocation Study #2

Page 4 - Metered Subsystems – MSS that are requesting CRR obligations as an LSE are allocated CRRs based on their net MSS bubble load (internal bubble generation minus internal bubble load)

Q1 – How is internal generation defined? Is this generation located within the service territory of an MSS utility, or is it generation owned and scheduled by an MSS?

Q2 – The description of how CRRs will be allocated to MSS is unclear. Is the ISO proposing to decrement allocations by the MWs or MWHs of generation located within the MSS? How will peaking or limited energy plants be handled?

Page 5
Network Model
Study 2 is planning to utilize a DC model, while the July 2003 filing specifies use of an AC model. The potential for inconsistencies between Study 2 results and results which result from the filed methodology needs to be addressed and resolved.

Page 7
Load Distribution Factors
Will 2005 Summer load distribution factors be used in all months? It would appear that this could produce skewed results in other seasons.

Page 9
Bilateral contracts – Please provide detail on how generation sources will be determined or assumed.

Page 10
What is a MSS Load Aggregation Point? Roseville has its own MSS Agreement and is interconnected with the Western transmission system. What would the ISO designate as its Load Aggregation Point?

Page 11
Non-ISO Transmission Issues
The Study 2 proposal addresses only non-ISO 500KV transmission. Roseville Electric is interconnected to Western's 230KV system. How will this interconnection be handled in Study 2? Will Study 2 assume that the Western 230KV system is within the ISO control area, or will it be assumed to be in another control area? While a final determination of this issue has not been made the ISO needs to specify which alternative is being used in this study.