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To: ISO Stakeholder Affairs <ISOStakeholderAffairs@caiso.com>

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Subject: [EXTERNAL] NCPA Tariff Revision Comments for the Market Settlement Timeline Initiative

Good Afternoon,

Please update the Tariff verbiage for the Market Settlement Timeline initiative in the proposed changes to section 11 by integrating the passage regarding estimation of MSS metered demand (section 11.29.7.4.3 (d)); this is the section detailing the handling of "legacy" [i.e., current practice] statements into the language outlining CAISO's handling of estimation for the T+9B settlement statements commencing in 2021 (section 11.29.7.1.1), with no changes to the T+3B period language.

Specifically, we are requesting that section 11.29.7.1.1 read as follows:

11.29.7.1.1 Initial Settlement Statement T+9B

The CAISO will provide to each Scheduling Coordinator, CRR Holder, Black Start Generator or Participating TO for validation an Initial Settlement Statement T+9B for each Trading Day within nine (9) Business Days of the relevant Trading Day, covering all Settlement Periods in that Trading Day. The Initial Settlement Statement T+9B shall be based on the Settlement Quality Meter Data (actual or Scheduling Coordinator estimated) received in SQMDS. In the event Actual Settlement Quality Meter Data or Scheduling Coordinator Estimated Settlement Quality Meter Data is not received from a Scheduling Coordinator or CAISO Metered Entity, the CAISO will estimate Settlement Quality Meter Data for that outstanding metered Demand or Generation, including Demand Response Resources, for the Initial Settlement Statement T+9B calculation as follows:

- (a) CAISO Estimated Settlement Quality Meter Data for metered Generation will be based on total Expected Energy.
- (b) CAISO Estimated Settlement Quality Meter Data for metered Demand, including Non-Participating TO demand will be based on Scheduled Demand by the appropriate LAP. This value will be increased by fifteen (15) percent if the total actual system Demand in Real Time, as determined by the CAISO each hour, is greater than the total Scheduled Demand by more than fifteen (15) percent. CAISO Estimated Settlement Quality Meter Demand for Participating Load will not be increased by fifteen (15) percent.
- (c) CAISO Estimated Settlement Quality Meter Data for Demand Response will be calculated using the same method as set forth in Section 11.1.4(a) for metered Generation.
- (d) To estimate net load for a Metered Subsystem, the CAISO will apply a monthly historical based net/gross ratio to the MSS's estimated gross load. The historical monthly ratio shall be specific to each MSS Operator and shall be calculated as the sum of each entity's monthly actual net load divided by the sum of each entity's monthly actual gross load, of the previous year.

Thank You for your consideration of these comments.

NCPA Settlements Team

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