

January 15, 2013

The Honorable Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, D.C. 20426

Re: California Independent System Operator Corporation Docket No. ER06-615-

Dear Secretary Bose:

The California Independent System Operator Corporation ("ISO") hereby submits two versions of a report, entitled "Sixth Annual Report of the California Independent System Operator Evaluating Demand Response Participation in the ISO in Calendar Year 2012"; (hereinafter, "Sixth Annual Report"). The two versions are:

- A Confidential Version (marked as such) containing confidential information; and
- A Public Version (marked as such) in which the confidential information has been redacted.

Because the documents are two versions of the same report, the ISO has marked each version as Attachment A to this transmittal letter. The Commission has directed the ISO file an annual report on demand response participation in the Commission's June 25, 2007 Order on Compliance (California Independent System Operator Corp. 119 FERC ¶ 61,313 (2007) at P 226.

Though this letter, the ISO requests confidential treatment of the Sixth Annual Report, which is included as Attachment A to this filing, pursuant to Section 388.112 of the Commission's Regulations. Confidential treatment of this Sixth Annual Report is appropriate because the report contains commercially-sensitive data regarding the participation of one entity in the ISO's market.

The report identifies and describes market activities of multiple demand response participants. In submitting the report in past years, the ISO has informed individual customers that it would not disaggregate the reporting information and prepare a custom report for each customer. The ISO follows this practice because generating a custom report for each participant would be unduly burdensome, beyond the scope of the reporting requirement, and because the information is already available to the market participants through the ISO settlement process.

COMMUNICATIONS

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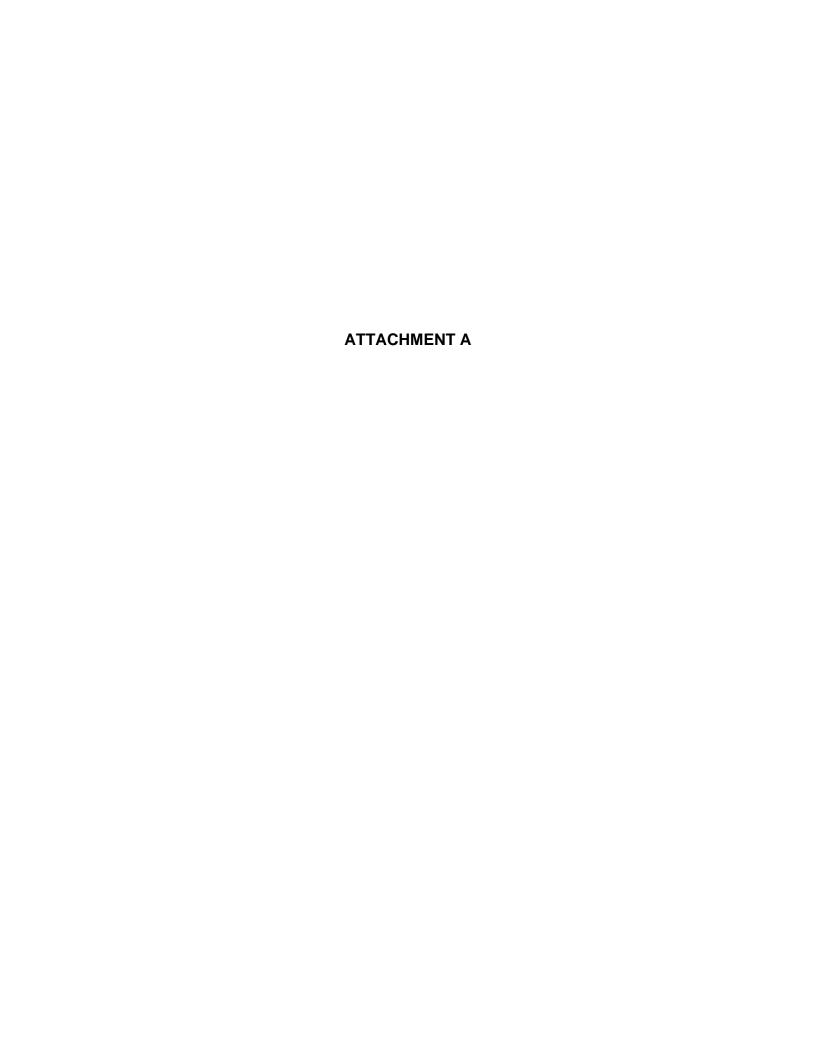
The following documents are included in this filing:

- (1) This Transmittal Letter;
- (2) Attachment A Report, entitled Sixth Annual Report of the California Independent System Operator Evaluating Demand Response Participation in the ISO in Calendar Year 2012

Respectfully submitted,

By: /s/ Baldassaro "Bill" Di Capo

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ATTACHMENT A

UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

California Independent System	Docket Nos.	ER06-615
Operator Corporation		

SIXTH ANNUAL REPORT OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR EVALUATING DEMAND RESPONSE PARTICIPATION IN THE ISO IN CALENDAR YEAR 2012

Date: January 15, 2013

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Re: Docket No. ER06-615-

INTRODUCTION

Obligation to Submit an Annual Report

The California Independent System Operator Corporation ("ISO") submits this "SIXTH ANNUAL REPORT OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR EVALUATING DEMAND RESPONSE PARTICIPATION IN THE ISO; (hereinafter, "Annual Report")¹

The reporting requirement emanates from the Commission's June 25, 2007 Order on Compliance in proceeding commonly known as the "MRTU Docket", which provided that:

Finally, we direct the CAISO to file annual reports evaluating its demand response programs, including the amount of demand response it has elicited. The CAISO should file the first report January 15, 2008. At a minimum, the CAISO's report must include: (a) information on customer enrollment for each demand response program in terms of the number of customers and total potential in load reduction in MWs; and (b) information on total load reductions achieved per program per event during the prior year, including the CAISO's system load at time of curtailments, total MWs reduced, total payments for reductions and effects of the demand response programs on wholesale prices.[FN See, e.g. ISO New England, Inc., 102 FERC [Paragraph] 61,202 (2003)]²

EXECUTIVE SUMMARY AND REQUEST FOR CONFIDENTIAL TREATMENT

Types of Demand Response Participation in the ISO

Participating Load: The Participating Load product is a dispatchable demand resource offered to the ISO through a demand response provider who also acts as the load serving entity for the underlying load. The Participating Load Agreement establishes the relationship between the demand response provider and the ISO and provides that the relationship is governed by the ISO Tariff.

Proxy Demand Resource: The ISO initiated its proxy demand resource product in August 2010.³ The proxy demand resource product was developed with extensive

¹ The ISO is sometimes referred to as the CAISO.

² California Independent System Operator Corp. 119 FERC ¶ 61,313 (2007) "June 25, 2007 Order on Compliance Filings" (hereinafter "June 25, 2007 Order") at P. 226.

³ Order Conditionally Accepting Tariff Changes and Directing Compliance Filing, 132 FERC ¶ 61,045 (issued July 15, 2010), accessible on the ISO's website at http://www.caiso.com/27d9/27d9cbb6770.pdf.

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stakeholder input in response to the FERC Order 719, which required that the ISO amend its market rules to permit an Aggregator of Retail Customers (aka demand response provider) to bid demand response on behalf of retail customers directly into the ISO organized market. The Proxy Demand Resource Agreement establishes the relationship between the demand response provider and the ISO and provides that the relationship is governed by the ISO Tariff.

Demand Response Participation

As of the date of this report, the ISO has three total active demand response participants. The ISO Participating Load product has one active participant; the California Department of Water Resources State Water Project ("CDWR-SWP"). This participant schedules, bids, and settles under unique Participating Load resource IDs, which can represent multiple underlying aggregated pump loads.

The proxy demand resource product has three active participants; Pacific Gas and Electric ("PG&E"), Southern California Edison ("SCE") and San Diego Gas & Electric ("SDG&E"). These participants bid under unique proxy demand resource IDs, which represent multiple underlying aggregated retail service accounts.

Scope of this Report

This report follows the ISO's previous annual reports of not including data for Pumped Hydro Storage Facilities. As the ISO originally explained in its First Annual Report, the reason for this approach is that these facilities operate differently than traditional demand response resources, in that pumped hydro storage facilities affirmatively schedule and increase load as well as provide load curtailment. The ISO believes that this report's focus on traditional demand response resources results in more meaningful content, because the reported information can be more meaningfully compared against other regions and organized markets, which was a primary purpose for imposing the reporting obligation.

<u>Demand Response Contribution to ISO Non Spinning Reserves Needs for 2012</u>

On average, over the January 1st to November 30th period covered in this report, the ISO system needed approximately 867 MW of Non-spinning Reserve capacity per hour to operate. The demand response market participants that are the subject of this report contributed, on average, MW of Non-spinning Reserve, either through accepted bids or self-provision. These MW represents % of the ISO's hourly Non-spinning Reserve need for 2012.

In 2012, demand resources cleared (bid and self-provided) an hourly maximum of MW and a minimum of MW of Non-spinning Reserve capacity to the ISO.

⁴ Wholesale Competition in Regions with Organized Electric Markets, Order No. 719, FERC Stats. & Regs. ¶ 31,281 (2008) at P 154, order on reh'g, Order No. 719-A, 74 Fed. Reg. 37,776 (Jul. 29, 2009), FERC Stats. & Regs. ¶ 31,292, order on reh'g and clarification, Order No. 719-B, 129 FERC ¶ 61,252 (2009).

SUMMARY THE ISO'S DEMAND RESPONSE PROGRAMS FOR THE 2011 TIME PERIOD

Participating Load

In 2012, there were active Participating Load resources associated with large pumping resources.⁵

The active Participating Load resources in the reporting period can be broken down as follows:

Participant: California Department of Water

Resources State Water Project

("CDWR SWP")

Total of No of Resource IDs:

> These Participating Load Resources represent an aggregation of pumps; they have been aggregated into separate Participating Load "facilities," scheduling for and settlement purposes.

Proxy Demand Resources

In 2012, there were nine active proxy demand resources. The active proxy demand resources in the reporting period can be broken down as follows:

Participant: Pacific Gas and Electric ("PG&E")

Total of No of Resource IDs:

> These proxy demand resources represent an aggregation of retail service accounts assembled into unique resources for

scheduling and settlement purposes.

San Diego Gas & Electric ("SDG&E") Participant:

Total of No of Resource IDs:

> This proxy demand resource represents an aggregation of retail service accounts assembled into a resource for

⁵ These Participating Load resources are unique, non-pumped hydro storage facilities.

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scheduling and settlement purposes.

Participant: Southern California Edison ("SCE")

No of Resource IDs: Total of

This proxy demand resource represents an aggregation of retail service accounts assembled into a resource for scheduling and settlement purposes.

Reporting Period for this Report and the Time Constraints of the Data Set

The reporting for the Sixth Annual Report reflects the same time constraints as the previous annual reports with respect to the time frames for which the data can be captured and conveyed by the January 15th due date. In order to produce and present relevant data consistent with the June 25, 2007 Order, the ISO must largely cull, correlate, and set out information compiled from a larger pool of underlying data in the ISO's settlement system. Thus, the ISO's information gathering is constrained by the structure of the ISO's settlement system and to the extent data can be timely analyzed and presented for inclusion in this Sixth Annual Report. The data set for this report runs from January 1, 2012 through November 30, 2012 ("Reporting Period") since not all December 2012 settlement data elements are timely available to incorporate into this report; therefore, data through the end of the calendar year cannot be gathered and complied for the full year before the report due date of January 15.

The Reporting Period of January 1, 2012 to November 30, 2012 comprises:

- Ninety-two percent (92%) of the 2011 calendar year period,
- 8,016 hours out of 8,760 total hours in the calendar year, or
- 334 out of 365 calendar days.

For future reporting purposes, the ISO respectfully submits that future annual reports could convey better information if the filing deadline were shifted, so that the reporting period could capture an entire twelve (12) month, 365 day calendar year. Later in the year, the ISO will file a motion with the Commission, asking to change the reporting date, to present this issue to the Commission. The file date would be best adjusted to a period more than 90 days after the calendar-year end to ensure final settlement data can be analyzed and included in the report.

In addition, the ISO Department of Market Monitoring (DMM) produces an annual report on the performance of the markets administered by the ISO. This DMM annual report covers the period of January 1st through December 31st of the year that is the subject of the report, and is published in a late-March to April time frame. Information in the DMM annual report pertaining to subjects such as system resource adequacy, ancillary services quantities and market performance, and other subjects,

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would be useful to ISO personnel in producing this annual report on demand response participation within the ISO markets.

NON-SPIN CAPACITY AWARDS AND PAYMENT FROM PARTICIPATING LOAD RESOURCES

In the ISO's wholesale market, market participants can choose to bid Ancillary Services (such as Non-Spinning Reserves), or to self-provide them. Market participants that choose to bid ancillary services receive the Ancillary Service Market Clearing Price. Accordingly, the ISO makes payment to them for the ancillary service capacity type that was offered and accepted. On the other hand, those market participants that fulfill their ancillary service obligation by self-providing effectively receive an offset of their ancillary service obligation. The offset reduces or eliminates the quantity of ancillary service capacity that they must procure from the market.

On average, for the Reporting Period, the ISO system needed approximately 867 MW of Non-spinning Reserve capacity per hour to operate. This procurement average of 867 MW per hour is based upon the total ISO system requirement for non-spinning reserve capacity divided by the total number of hours for the reporting period of Jan 1, 2012 to Nov 30, 2012, which equates to 8,016 hours.

The range of Non-spinning Reserve capacity offered (or self-provided) exhibited some variations during certain, limited hours in 2012. In this regard, Participating Load resources cleared (bid and/or self-provided) an hourly maximum of MW and a minimum of MW of Non-spinning Reserve capacity on certain occasions. On average, however, MW per hour was bid or self-provided to the ISO.

TABLE 1 - Non-spinning Reserve Capacity Awards and Payment*								
Total Non-spin Capacity Bid (MW)	Total Non-spin Capacity Awarded (MW)	Total Non-spin Capacity Payments (\$)	Total Non-spin Capacity Self-provided (MW)					

^{*} These values represent cumulative totals based on all demand response resources.

No-Pay for Unavailable Non-spin Capacity from Participating Load Resources

No-Pay is a settlement mechanism to encourage resources, both generators and Participating Loads, to keep awarded Ancillary Services available for ISO dispatch (i.e., by following dispatch instructions and by avoiding uninstructed deviations). When

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triggered, the No-Pay mechanism results in the rescission of payment for the provision of Spinning Reserve and/or Non-spinning Reserve when, subsequent to: i) the ancillary service award for such ancillary services and ii) the ISO payment for the services, the ancillary service becomes either undispatchable capacity, unavailable capacity, undelivered capacity, or, in certain circumstances, unsynchronized capacity. In 2012, a small percentage of the total non-spinning capacity awarded to demand resources (approximately %) was rescinded through the No-Pay settlement mechanism during the reporting period.

TABLE 2 - Summary of Unavailable Non-Spin Capacity								
Total Non-spin Capacity Awarded and Self-provided (MW)	Total Non-spin Capacity Unavailable Subject to the No Pay Provision (MW)	Total Non-spin Capacity Payment Rescinded Subject to the No-Pay Provision (\$)						

Real-time Energy and Payment from Participating Load Resources

To meet its real-time reliability needs, the ISO dispatches real-time energy from dispatchable demand resources when it is economic to do so, based on the submitted bids that the Scheduling Coordinator has submitted to the ISO for Participating Load resources. A Participating Load resource can bid to curtail energy and to consume energy, in a fashion similar the way a generator can bid both incremental and decremental energy, by increasing or decreasing the generators energy output. Per ISO real-time dispatch instructions, a Participating Load resource is either paid for the amount of energy that the resource is instructed to curtail or pays for the amount of energy that the resource is instructed to consume. (This is analogous to the ISO paying a generator to increase output ("INC") and, correspondingly, the generator paying the ISO to decrease output ("DEC") relative to the resource's scheduled energy amount.) Any deviations associated with the ISO's real-time dispatches, i.e. under-deliveries or over-deliveries, will be settled with the Participating Load resource as uninstructed energy.

The *Total Energy Settlement* values shown in Table 3 and Table 4 below are the net settlement of the ISO's instructed and uninstructed energy for dispatches to decrease consumption and for dispatches to increase consumption, respectively.

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EVALUATING DEMAND RESPONSE PARTICIPATION IN THE ISO IN 2012

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TABLE 3- Decrease Energy Dispatches- Real-time Energy & Settlement Summary									
Total Real- time Energy Offered (MW)	Total No. of Dispatches (Events)*	Total Real-time Instructed Energy (MW)	Total Real- time Energy Delivered (MW)	Total Energy Payments to DR Resources (\$)					

^{*}Where dispatches equal to or greater than 0.015 MW, in any interval, are aggregated by trade hour.

TABLE 4- Increase Energy Dispatches- Real-time Energy & Settlement Summary									
Total Real-time Energy Offered (MW)	Total No. of Dispatches (Events)*	Total Real-time Instructed Energy (MW)	Total Real time Energy Delivered (MW)	Total Energy Charges to DR Resources (\$)					

^{*}Where dispatches less than -0.015 MW, in any interval, are aggregated by trade hour.

Real-time Energy Dispatch Detail for Participating Load Resources

See <u>Appendix A to this Sixth Annual Report</u> for a detailed breakdown of Real-time energy dispatch, by hourly event.

SUMMARY OF ISO EVENTS BY MONTH AND HOUR

Given that the majority of dispatchable demand resource megawatts reported here are associated with large pumping resources used to move water, Participating Load resources do not exhibit the more traditional summer-peak demand response characteristic that one expects from demand response resources.

However, the fact that Participating Load resources, like large pumping resources, can participate in the ISO markets in all months and hours of the year means such resources can be of benefit to the ISO as the system operator and helps further demonstrate the comparability that exists in the ISO wholesale market between supply-side and demand-side resources.

ISO Real-time Dispatches by Month

The data below demonstrates the broad availability of these Participating Load resources to provide real-time imbalance energy, both the ability to increase and decrease energy consumption based on ISO system needs. Table 5 below lists the days and hours

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by month that Participating Load resources were called to curtail load, i.e. decrease energy and Table 6 lists the days and hours by month that Participating Load resources were called on to consume energy, i.e. increase energy consumption. Table 7 lists the number of dispatch events by hour for the Reporting Period.

TABLE 5- Decrease Load								
ISO Dispatches by Month								
Month	Days	Hours						
January								
February								
March								
April								
May								
June								
July								
August								
September								
October								
November								
December								
Total:								

TABLE 6- Increase Load ISO Dispatches by Month								
Month	Days	Hours						
January								
February								
March								
April								
May								
June								
July								
August								
September								
October								
November								
December								
Total:								

TA	TABLE 7 ISO Dispatches by Hour																						
	<u>Hour Intervals</u>																						
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
	Count of Dispatches per Interval																						

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SUMMARY ISO DEMAND RESPONSE RESULTS ACROSS REPORTING YEARS

For 2012, the percentage of demand response contribution towards the ISO hourly average non-spinning reserve capacity requirement decreased to % from approximately % in 2011. Real-time energy offers from demand response increased in 2012 by 11% compared to 2011, even though the amount of energy the market required for economic dispatch from demand response declined by 100%. In 2011, real-time energy demand response dispatches were issued whereas in 2012, only were issued.

Below are summary tables of comparative results across reporting years:

TABLE 8
Annual DR Contribution to Hourly Avg. Non-spin Capacity Requirement

		<u> </u>	<u> </u>
	Hourly Avg.	Hourly Avg.	Percentage of
	Non-spin	Awarded Non-	Hourly Non-spin
	Requirement	spin Quantity	Requirement
Reporting Year	(MW)	(MW)	(%)
2007	812		%
2008	899		%
2009	906		%
2010	883		%
2011	849		%
2012	867		%

TABLE 9
Year-to-Year Comparison of Non-spin Capacity from Demand Resources*

T CUIT TO T CUIT	Comparison o	Tron spin cupu	orej mom zemana	11000 di 1 cco
			Total Non-spin	Total Non-spin
		Total Non-spin	Capacity	Capacity Self-
Comparison	Reporting	Capacity Bid	Awarded	Provided
Years	Year	(% Diff)	(% Diff)	(% Diff)
2007/2008	2008	15.7%	-31.9%	-17.9%
2008/2009	2009	-9.0%	-83.6%**	164.6%**
2009/2010	2010	-52.3%	-67.0%	57.2%
2010/2011	2011	181.6%	-64.4%	5.8%
2011/2012	2012	70.4%	1,554.7%	-61.9%

^{* (-)} is a decrease and (+) is an increase in percentage difference between years

^{**} Significant increase in the amount of Non-spin capacity self-provided in 2009 vs. 2008

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TABLE 10 Year-to-Year Comparison of Compliance from Demand Resources Providing Nonspin*

		Total Non-spin	Total Non-spin	Total Non-spin
		Capacity	Capacity	Capacity Payment
		Awarded and	Unavailable	Rescinded Due to
Comparison	Reporting	Self-Provided	Subject to No Pay	No Pay Provision
Years	Year	(% Diff)	(% Diff)	(% Diff)
2007/2008	2008	-26.9%	-18.0%	-69.0%
2008/2009	2009	15.0%	-72.3%	-21.3%
2009/2010	2010	46.5%	365.9%	6.2%
2010/2011	2011	4.5%	-90.2%	-99.5%
2011/2012	2012	-51.2%	1,884.4%	97,998.6%

^{* (-)} is a decrease and (+) is an increase in percentage difference between years

TABLE 11 Year-to-Year Comparison of Real-time Energy from Demand Resources (Load Curtailments)*

	,				
		Total Real-		Total Real-time	Total Real-time
Comparison	Reporting	time Energy	Total No. of	Energy	Energy
Years	Year	Offered	Dispatches	Instructed	Delivered
		(% Diff)		(% Diff)	(% Diff)
2007/2008	2008	-25.5%	55.4%	16.1%	1.2%
2008/2009	2009	-55.4%	320.8%	-22.1%	-0.4%
2009/2010	2010	252.2%	-67.1%	-67.4%	-63.2%
2010/2011	2011	149.8%	86.4%	33.4%	-12.7%
2011/2012	2012	10.9%	-98.2%	-100.0%	-99.5%

^{*(-)} is a decrease and (+) is an increase in percentage difference between years

T		ENERGY DISPATCH BY HOURLY EVENT	
Dispatch Event		Data	VALUI
Day	Hour	Real-time Energy Dispatched; (MW)	
		RT Energy Delivered; (MW)	
		Energy Payment; (\$)	
		Hourly Avg. System Load; (MW)	
		Real-time Energy Dispatched; (MW)	
		RT Energy Delivered; (MW)	
		Energy Payment; (\$)	
		Hourly Avg. System Load; (MW)	
		Real-time Energy Dispatched; (MW)	
		RT Energy Delivered; (MW)	
		Energy Payment; (\$)	
		Hourly Avg. System Load; (MW)	
		Real-time Energy Dispatched; (MW)	
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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service lists in the above-referenced proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 15th day of January 2013.

<u>(s/ Anna Pascuzzo</u> Anna Pascuzzo