NRG Comments on Convergence Bidding at the Interties
August 26, 2011

- While the CAISO's proposed insertion of the word "Transmission" prior to "Constraints" in Section 11.2.4.6 seems completely unrelated to the elimination of convergence bidding at the interties, the CAISO's proposed modifications seem appropriate. However, these insertions beg a larger question – are there other places in the CAISO where the CAISO uses the word "constraint" when it should be using the more precise defined term "Transmission Constraint"? For example, should the CAISO be using the term "Transmission Constraint" in Sections 8.3.3.2 (g) and 11.10.1.2.1? The term "Transmission Constraint" should be used whenever the limitation relates to how much power can flow through a network element. For example, when the CAISO refers to regional constraints on the provision of Ancillary Services, do those constraints on Ancillary Services procurement stem from network power-carrying limitations? If so, those constraints should also be referred to as "Transmission Constraints".

- The CAISO should affirmatively state in the definition of "Eligible PNode" that virtual bidding is not permitted at PNodes located at interties.

Brian Theaker
Director, Market Affairs
NRG Energy, Inc.
530-295-3305 (office)
530-320-3596 (cell)
brian.theaker@nrgenergy.com