

## Stakeholder Comments Template

### Subject: Straw Proposal – Mitigation and Allocation of Real-Time Energy Imbalance Offset Costs (CC 6477)

Submitted by	Company	Date Submitted
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Powerex appreciates this opportunity to provide these comments on the Straw Proposal.

Powerex supports the CAISO continuing in their efforts to address the price differences between HASP and RT and, as previously stated, Powerex believes a two-tier allocation is the most appropriate rate design for the RT offset.

Finally, Powerex does not object to the CAISO being diligent in their price correction efforts. However, Powerex believes that price corrections should be limited to flaws and limitations in the market software as opposed to second guessing of Operational decisions made based on the best available information at that time. The CAISO should not be using after-the-fact information (that was not available to Operators) as the basis for correcting prices.