

Proposal for Tariff Changes to Enhance Rules for the Release of Congestion Revenue Rights

Resolution of Open Issues

Stakeholder Conference Call, April 12, 2007



Stakeholders and the ISO reviewed and discussed five issues related to CRR Release Process.

- Use of Trading Hubs as CRR sources
- Possible changes to CRR source verification rules
- Set-Aside of Import Capacity for Auctions
- Renewal of Expiring LT-CRR and ETC/CVR
- Methodology for Allocating CRRs to Merchant Transmission Sponsors



Use of Trading Hubs as Sources for Allocated CRRs

- Final ISO Proposal: Disaggregate CRR nominations into individual generator CRRs that comprise each Trading Hub
 - Avoids inefficient competition between Trading Hub CRRs versus individual generator CRRs
 - Most level playing field between parties who qualify mostly for Trading Hub CRRs and parties who require mainly individual generator CRRs.
 - Allows Trading Hub CRRs in Tier LT
 - Broad stakeholder support



Possible Changes to CRR Source Verification Rules

- A. Expansion of the set of verified sources
 - Current ISO Proposal: Adhere to the filed MRTU tariff, (except for updating the reference period to 2006.)
 - No expansion that would allow contracts for future delivery avoids potential side effects.
- B. Minimum contract length for source verification
 - Final ISO Proposal: Retain the filed MRTU tariff language that contracts submitted for CRR source verification must be at least one month in duration.
 - Limited stakeholder support for shorter duration.



Set-aside of Import Capacity

- Final ISO Proposal: Retain set-aside calculation based on verified quantities (per filed MRTU Tariff)
 - Change of reference year to 2006 should not have large impact on the set-aside quantities. Reliance of LSEs on imports probably has not changed significantly from 2004 to 2006.
 - Potential changes to the set-aside provision probably have broader impacts on the CRR allocation design.



Renewal of Expiring LT-CRRs and ETC/CVR

- Final ISO Proposal: Allow holder of expiring rights to nominate those rights for LT-CRRs in the first Tier LT process in which the expiring rights are eliminated in all years.
 - Applies to expiring ETCs and CVRs as well.
 - LT-CRR nominations would be allowable even though the CRRs did not go through the PNT first
 - Provides 9-year renewal, not 10-year



Methodology to determine CRRs for Merchant Transmission Upgrades

- Final ISO Proposal Incorporate two-step methodology within Tariff for allocating CRRs to MT sponsors.
 - Similar to PJM's approved practices
 - Permits MT sponsors to get CRRs that utilize existing capacity that was previously unusable and was "awakened" by the merchant project
 - Allows CRR options



Questions and Comments

- Use of Trading Hubs as CRR sources
- Possible changes to CRR source verification rules
- Set-Aside of Import Capacity for Auctions
- Renewal of Expiring LT-CRR and ETC/CVR
- Methodology for Allocating CRRs to Merchant Transmission Sponsors



Additional CRR-related Issues

- Continued stakeholder review and discussion on CRR Credit Requirements
 - Policy resolution to be presented to ISO Board in late May; FERC filing promptly thereafter
- Rules for Load Migration; Outage Modeling; Common Monthly Forecasts
 - Policy resolution to be presented to ISO Board in July; FERC filing by August 3.