

Stakeholder Comments
CAISO Congestion Revenue Rights (CRR) Clawback Modification
Draft Tariff Language

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In section 11.2.4.6 (a), the draft language¹ currently states [emphasis added]:

“... will be treated as a Virtual Award if the segment of the Bid leading to the Schedule reduction is: **at a price** greater than the Day-Ahead Market LMP at the relevant intertie, in the case of an import; or **at a price** less than the Day-Ahead Market LMP at the relevant intertie, in the case of an export...”

Since the term “at a price” can be broad, it may need to be more specific, such as “at a bid price”. In addition, for completeness, this sentence should consider a situation where the Bid is a self-schedule. For a self-schedule, there is no (bid) price associated with the segment of the Bid, and arguably the draft language as currently written would not apply to those self-schedules. A clarification is needed in this regard.

¹ <http://www.caiso.com/Documents/DraftTariffLanguage-CongestionRevenueRightsclawbackrulemodification.pdf>