

From: Wu, Tong [Wu@WAPA.GOV]
Sent: Monday, July 30, 2012 3:59 PM
To: CAISO Tariff
Subject: WAPA Comments on Inter-SC Trades Oversight Exemption Draft Tariff Language

Western Area Power Administration (“Western”) Sierra Nevada Region appreciates the opportunity to provide comments on the draft Tariff language regarding the Inter-SC Trade (IST). Western has the following clarification questions:

1. What specifically are required to obtain "prior authorization from the CAISO" to participate in Inter-SC Trade?
2. What does “Market Participant” mean here in the phrase "transfer of energy or a MW obligation to or from a Market Participant?” Does a “Market Participant” mean a SC registered with the CAISO?
3. How does paragraph b(ii) affect a business entity such as Western that has multiple SC IDs? Can two SC's of the same business entity enter into an inter-SC Trade under the proposed draft Tariff?
4. Why does the CAISO need price as part of the compliance requirements? The "separate transaction" can be a trade by-kind without a price.

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