

Good afternoon,

The following are the Western Area Power Administration, Sierra Nevada Region's comments to the Revised FERC Order 764 Draft Tariff language:

1. It appears there are still overlapping time periods in 30.7.3.6.3.2 regarding Position Limits at Interties. In paragraph c, "Position limits of twenty-five (25) percent will apply during the time period beginning on the first day of the twenty-first month.... through the last day of the twenty-fourth month... In paragraph d, "Position limits of fifty (50) percent will apply during the time period beginning on the first day of the twenty-fourth month..." Position limits of 25 percent went through the last day of month 24, but position limits of 50 percent begin with the first day of month 24. Also in paragraph e, it appears "twenty-ninth day" should read "twenty-ninth month".
2. In section 34.2.5, it stipulates the CAISO can abort the HASP and perform all remaining RTM processes. What happens to hourly block bids in this case? Do they revert back to the DAM? On one of the stakeholder calls, we received a verbal answer that the bids will revert back to the IFM and a BRQ was quoted. Can this be inserted into the tariff language?
3. Section 34.1.3 and 34.1.4 reference Section 30.7 although there is no 30.7 heading in the document. Is there a separate Section 30.7? Or was it not referenced due to no changes to that portion?
4. Section 27.4.1 references Section 31.7 yet there is no Section 31.7 in this document. Is there a separate section for 31.7? Or was it not referenced due to no changes to that portion?

Thank you for your consideration when reviewing our comments.

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