Attachment C

Stakeholder Process for Interim Capacity Procurement Mechanism Tariff Filing

Summary of Submitted Comments

Stakeholders submitted five rounds of written comments to the CAISO on the following dates:

- May 25, 2007 – 12 sets of comments
- August 9, 2007 – 15 sets of comments
- October 24, 2007 – 14 sets of comments
- November 21, 2007– 7 sets of comments
- January 7, 2008– 12 sets of comments

Stakeholder comments are posted at: http://www.caiso.com/1bc5/1bc5db284cc80.html

Other stakeholder efforts include:

- Stakeholder meetings
  - May 18, 2007 (22 attendees and 53 phone participants)
  - June 6, 2007 (24 attendees and 31 phone participants)
  - July 25, 2007 (26 attendees and 46 phone participants)
  - October 15, 2007 (27 attendees and 47 phone participants)
- Stakeholder conference calls
  - October 18, 2007 (69 phone participants)
  - November 15, 2007 (49 phone participants)
  - December 20, 2007 (47 phone participants)

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Management Proposal	Load Serving Entities, Energy Service Providers, End-Use Customers, Ratepayer Groups *	Resource Suppliers *	California Public Utilities Commission *	Management Response
1. Effective Date –Allow RCST to expire by its own terms on 12/31/07, and implement ICPM on the effective date of MRTU implementation.	Conditionally Support: Six Cities - ICPM should be implemented as proposed. Oppose: TURN, PG&E, CLECA, AReM, SCE - RCST should be extended until implementation of MRTU, and then ICPM implemented at MRTU.	Oppose: Reliant, Dynegy - RCST should expire by its own terms on 12/31/07, and ICPM should be implemented on 1/1/08. Oppose: Constellation - Proposal needs to provide payment mechanism between 1/1/08 and start of MRTU.	Oppose. Support continuation of RCST until MRTU startup and/or implementation of ICPM.	On December 20, 2007 FERC ordered that ICPM need not be filed and made effective on 1/1/08 and instead preliminarily concluded that RCST should be extended until start of MRTU or an alternative backstop mechanism is filed. ICPM is designed to work under MRTU design and will not function under a pre-MRTU market structure.
2. Duration of Tariff – Automatically sunsets on 12/31/10. Revisit after progress is made at state level regarding design of long-term RA framework to create more permanent mechanism.	Support: Six Cities, PG&E, SCE, CMUA, CLECA Conditional Support: AReM - If MRTU is delayed beyond 4/1/08, consider moving sunset date to 2011.	Support: Constellation Conditional Support: Dynegy - Conditional support if CAISO commits to start stakeholder process at least 15 months prior to sunset date. Oppose: Reliant - ICPM should not sunset on a date certain. Instead should remain in effect until a capacity market is implemented in tariff.	Support: No comment on sunset date. Revisit sometime after progress is made at state level regarding design of long-term RA framework to create more permanent mechanism	Duration has been shortened from initial ICPM proposal of 5 years to current 33 months. May be appropriate to revisit ICPM sooner than 2010, depending on timing of implementation of long-term RA mechanism.

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3. Backstop to RA Process – CAISO can procure resources as a "last resort" to backstop RA programs of CPUC and LRAs if LSE does not fulfill its RAR. Each LSE is first given a chance to cure an identified deficiency.	Support: TURN, PG&E, CMUA, Support: Six Cities, CLECA, AReM, - Critical that LSEs be given opportunity to cure before CAISO procurement. Conditional Support: SCE – Chance to cure must allow effected LSE time to make necessary business decisions.	Support: Reliant - CAISO authority to backstop RA; is necessary until capacity market is implemented in tariff. Support: Dynegy - CAISO should be required to procure resources to meet RA requirements. Conditional Support: Constellation - Provided procurement is for a time duration equivalent to RA showing deficiency. IEP - Support: a single trigger and oppose bifurcated trigger between RA deficiencies and Significant Events.	Support	This authority is needed as "last resort" if LSEs do not cure identified deficiencies, and to ensure that local capacity requirements established by the CAISO tariff are met. An opportunity to cure is provided. Many features have been added to ICPM to provide transparency and checks and balances to protect against over-procurement. This authority is necessary to enable CAISO to maintain reliable grid operations.
4. Backstop for a Significant Event – CAISO can procure resources beyond RA resources provided by LSEs if an event occurs that threatens CAISO's ability to operate the grid in a manner that meets Applicable Reliability Criteria ("ARC").	Support: TURN Conditional Support: CLECA – Should be used rarely and only in extreme cases. Conditionally Support: PG&E - CAISO should have Board approve all designations longer than 30 days. Conditional Support: SCE - CAISO should revise the definition of Significant Event as proposed by SCE and, if not revised, should have Board approve all designations longer than 30 days. Conditional Support: AReM – Agree CAISO may need to procure in rare cases; disagrees with minimum term, cost allocation and denial of RA credit. Conditionally Oppose: Six Cities - Definition of Significant Event is overly broad and could allow CAISO to procure capacity when not warranted.	Support: Dynegy - CAISO should be required to procure capacity to meet reliability needs. IEP supports a single trigger and oppose bifurcated trigger between RA deficiencies and Significant Events. Oppose: Reliant - Concept of Significant Event should be stricken and replaced with straight-forward payment trigger. Oppose: Constellation – Significant Events are covered in RA Planning Reserve Margin.	Support conditionally, so long as ARC reflects NERC/WECC reliability criteria, and any further criteria are fully, effectively vetted with stakeholders and do not circumvent CPUC decisions about long-term reliability levels for California.	It has been shown historically that RA resources are not always sufficient to ensure reliable grid operations. Unexpected events of an enduring nature can affect grid facilities such that the CAISO cannot meet ARC. It is reasonable for CAISO to procure capacity from available resources to mitigate the need for declaring system emergencies and maintain reliable grid operations. This authority is necessary to enable CAISO to maintain reliable grid operations where available resources are not otherwise procured.

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5. Product –Would procure a "capacity only" product, under a tariff-based schedule for service, and pay for a call option on the capacity of a resource. Would continue to engage in RMR contracting in 2008 and beyond, minimizing its use. Would not include services such as black start, dual fuel capability and voltage support in ICPM.	Support: Six Cities, CLECA, AReM Conditional Support/Oppose: Constellation - Support capacity-only product; oppose continuation of RMR. Support: PG&E - Resource should have must-offer obligation for energy, and requirement to bid available Ancillary Services. Conditional Support: SCE – Support capacity only; do not use more RMR unless cost allocation revised. Conditional Support: TURN - Do not necessarily agree that use of RMR should be minimized. CMUA - CAISO should use least cost principles in determining whether RMR or ICPM is appropriate.	Support: Reliant - Product should be capacity only for term of procurement. Support/Oppose: Dynegy – Product should be a capacity only product – buying an offer obligation. CAISO should not continue to rely on RMR as it can discourage LSE forward procurement.	Conditionally support - Do not oppose the ICPM, but believe that an energy-only backstop mechanism may make sense in light of anticipated market developments, including MRTU.	RMR contracting needs to continue to be used in 2008 and beyond due to the unique services in RMR that may be needed in certain locations, but its use will be minimized. It is not feasible to incorporate black start, dual fuel capability and voltage support services into ICPM and have ICPM available at the start of MRTU. Most entities now support the concept of ICPM including just a "pure capacity" service.
6. Designation is voluntary - Resource owner can decline a designation when offered by CAISO.	Support/Oppose: Six Cities - Support voluntary for backstop to RA process, but mandatory for Significant Events. Conditional Support: AReM – Can support voluntary, but notes it might cause need to employ RMR. Oppose: PG&E, CLECA - Resource owner should be required to accept a designation; concerned with market power and inefficiencies from voluntary, which could adversely impact reliability Oppose: SCE – Voluntary creates adverse selection problem that could raise costs to consumers. Oppose: TURN - If payment determined to be just and reasonable, no reason for voluntary.	Support: Constellation, Dynegy Support: IEP - Voluntary appropriate, but unlikely generator would decline a call. Oppose: Reliant - Declining a call from the CAISO should not be an option.	Oppose. Voluntary nature of ICPM designation fosters market power concerns and raises concerns about need for market power mitigation in the Exceptional Dispatch process, as Exceptional Dispatch would be the backstop for the ICPM/backstop mechanism.	Considered mandatory designation, but determined there are adequate incentives to accept designation, including provision where owner of resource can request payment higher than $41/kW-year if justified to FERC. FERC has ruled that there is no Must-Offer Obligation under MRTU. A voluntary approach is appropriate given there is no consensus among stakeholders – parties are extremely polarized on issue of appropriate price.

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7. <u>Designation process and trigger for Type 1 procurement</u> – If LSE has deficiency in its RA showing, or portfolio of RA resources provided by LSEs is not fully effective, CAISO will give LSEs opportunity to cure; if they do not resolve it CAISO would procure.	Support: TURN, Six Cities, PG&E, Support: CLECA, AReM – And strongly support opportunity to cure before CAISO procures. Conditional Support: SCE – Chance to cure must allow effected LSE time to make necessary business decisions. CMUA – Requests clarification that procurement is driven by need only & effectiveness factors standard.	Support: Reliant - Procurement should occur timely ahead of compliance year or month. Support: Dynegy - but rate must be compensatory and not based on unattainable standard or subjective exercise of discretion. Conditional Support: Constellation – Support provided the term is equivalent to deficiency. IEP – Support a single trigger for all ICPM procurement.	Conditionally Support as long as "effectiveness" analysis is vetted and based on NERC/WECC criteria and does not circumvent CPUC decisions on long-term reliability levels.	Believes it is prudent to provide Type 1 procurement authority as "a last resort" in the event that the RAR is not met. LSEs are given opportunity to cure a deficiency. Penalty imposed on an LSE does not guarantee that capacity will be there if CAISO needs it.
8. <u>Designation process and trigger for Type 2 procurement</u> – CAISO has flexibility in determining a Significant Event and definition tied to inability to meet Applicable Reliability Criteria ("ARC"). 3-step designation process used. Step 1: procure for just 30 days, announce in market notice and issue report. Step 2: determine if extension needed and engage with stakeholders to discuss further steps to address. Step 3: if another extension is needed and stakeholders do not procure to resolve problem, extend the procurement.	Support: CLECA – Except term in step 2 should not be for 60 days; instead only as long as needed. Conditionally Support: PG&E - Stakeholder process should be used to develop alternative solutions and designations longer than 30 days should be approved by Board. Conditionally Oppose: Six Cities - Definition of Significant Event is overly broad and could allow CAISO to procure capacity when not warranted. Oppose: AReM - Term in step 2 should not be for 60 days; instead only as long as need after 30 days. Oppose: SCE – CAISO should revise the definition of Significant Event as proposed by SCE and, if not revised, should have additional reporting and oversight provisions added, including Board approve all designations longer than 30 days. CMUA would like to greater discussion on triggers and how it affects cost allocation.	Oppose: Constellation - Designation should be limited to events that reduce Planning Reserve Margin below operating reserve levels. Strongly Oppose: Dynegy - Any non-market use should trigger a designation; repeated use of non-RA capacity over period of 3 days should require report on why resource was not designated. IEP – Support a single trigger for all ICPM procurement. Reliant - Concept of Significant Event should be stricken and replaced with a straight-forward payment trigger.	Generally support, so long as ARC is based on NERC/WECC criteria and does not circumvent CPUC decisions on long-term reliability levels. Steps should be expeditiously pursued.	Discretion is necessary. It is impossible to foresee all potential events that could occur during operating year. Adequate flexibility is necessary to avoid unintended consequences of overly prescriptive approach. Lack of action to address a known problem could place CAISO in position of planning for interruption of firm load or failing to meet ARC. Do not support "hard trigger" because it would not allow CAISO to exercise prudent judgment and could lead to over-procurement to address temporary events. 3-step process is reasonable compromise and allows interaction and possible cure by LSEs.

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9. Reporting Obligations – Report posted within 30 days after procurement and market notice issued within 2 business days, monthly report posted within 10 calendar days after end of each month showing non-market commitments of non-RA capacity, and ICPM info included in Operations report to Board.	Support : TURN, CMUA, Six Cities, AReM, Support: CLECA – Support, but should include info on RMR dispatch and Exceptional Dispatch as well. Support: PG&E – Support, but should also include info on non-RA RUC commitments as well. Conditional Support: SCE – Support, but believe additional CAISO accountability is needed for extending Type 2 designation beyond initial 30 days.	Support: Constellation, Conditional Support: Dynegy – Reporting requirements are reasonable assuming the CAISO complies with them.	Support, presuming that market participants have continuing input on content of reports, which should be at least as detailed as prior RCST reports.	There is broad support for this element. The reporting obligations in this proposal are consistent with the extensive reporting that stakeholders have requested and go far beyond what was required under RCST.
10. Term of Payments - Varies from one month to up to 12 months depending on length and type of RAR deficiency being remedied or length of time of the Significant Event. Duration is tailored to match the actual collective RA deficiency, or the length of the Significant Event. A 3-step process specifies an iterative, phased approach for procurement to provide for interaction with market participants.	Support: TURN, PG&E, SCE, CLECA Conditional Support: Six Cities - Terms should not be any longer than need for capacity. Term for effectiveness procurement should be only for the duration of the deficiency, as opposed to a fixed 12-month term. CMUA – Does not oppose this element, but notes this issue is part of the overall compensation package and must be considered in that light. Oppose in part: AReM – Oppose the minimum procurement term for Significant Events. Term in step 2 should not be for 60 days; instead only as long as actual days needed after initial 30 days.	Conditional Support: Constellation - Term should be equivalent to duration of RA compliance showing deficiency. Oppose: Reliant - Concept of Significant Event should be stricken and replaced with straight-forward payment trigger. 3-step process should be stricken and replaced with minimum term triggered by a call to maintain ARC. Oppose: Dynegy - Forward procurement should be for RA term: 5 months (or balance of season) for system resources and full year for local resources. Real-time designation should be for a sufficient minimum term to provide meaningful fixed cost recovery - that may be far beyond the period of CAISO use.	Support	Proposal strikes a balance between the term desired by suppliers to ensure revenue adequacy and appropriate compensation for the service provided, and the LSEs' desire to not over-procure or pay what they might view as an excessive amount for the service.

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11. Pricing - Price paid to resource would be based on Target Annual Capacity Price of $41/kW-year, with no deductions for peak energy rents, subject to an Availability Factor and a Monthly Shaping Factor. Resources with going-forward costs greater than $41/kW-year would be able to file at FERC for a price higher than $41, but owner would have to justify that price to FERC based on same types of costs that produced $41/kW-year default price.	Support: CLECA, Support: TURN – Proposal is a reasonable compromise of diverse stakeholder positions. Would ideally prefer cost based RMR compensation. Support: PG&E – Price falls within FERC-approved, and recently reaffirmed, zone of reasonableness. The removal of cost of new entry pricing and a demand curve has been a critical change to the proposal, which PG&E supports. Support: SCE – Support compensation values for Type 1 designations that are similar to those used under the current RCST mechanism. Conditional Support: AReM – Support a capacity-only price, but do not believe that CAISO has provided justification for $41/kW-year level, considering that previous proposal stated the going forward costs of generation were $22/kW-year. Conditional Support: Six Cities – Support, but showings of prices greater than $41 should be made *ex ante* as opposed to *ex post* to ensure transparency and certainty of cost outcome. CMUA - Do not oppose the $41/kW-year, no PER deduction approach. Object to policy direction that continues to not differentiate between seasonal attributes of capacity.	Oppose: IEP – Pricing should reflect existing market conditions. Proposed pricing appears to fall short of reflecting capacity backstop value. Oppose: Reliant – The proxy value of capacity should reflect vintage data for the cost of new entry. The cost of new entry value should be established by an independent party to reflect relevant up-to-date values. Oppose: Dynegy – Ability to keep energy and ancillary services is appealing, but given suppressed prices in real-time market, using a price more reflective of the real cost of new entry with a peak energy rent deduction would be more compensatory. Oppose: Constellation – Disappointed that CAISO has abandoned a market-based compensation approach. Requiring a resource to file for costs greater than $41/kW-year is burdensome and contrary to competitive markets. Proposal should specify when in process CAISO expects to know if resource will accept payment or file at FERC.	Support: Cost of new entry pricing for ICPM would interfere with CPUC jurisdiction to provide for California's long-term supply adequacy and with CPUC's RA program. Cost of new entry is not an appropriate basis for backstop capacity payments. The ICPM initiative should not get out ahead of CPUC long-term RA proceeding.	CAISO explored many pricing options, including competitive solicitations, auctions and cost-based Reliability Must-Run Agreements; however, these options were not chosen due to certain deficiencies with each option. The CAISO believes that the current ICPM proposal is superior to the other options that were considered, particularly given the concern that the CAISO not get ahead of development of the long-term RA design with this interim mechanism. The proposed $41/kW-yr. is sufficient to cover the going forward costs of most available resources. A mechanism is provided whereby an owner can file at FERC and seek a price higher than $41 if it believes that its costs are greater than $41/kW-yr.

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12. Formula for Capacity Payment – Use formula in RCST, and update it to reflect the new capacity pricing methodology under ICPM that has no peak energy rent deduction. Formula is Designated Capacity times Availability Factor times Monthly ICPM Charge	Support: PG&E, Support: SCE, CLECA, AReM - CAISO should ensure that formula captures concept that CAISO may be procuring only portion of a resource (CAISO note: This change has been made in Board proposal). Conditional support. Six Cities - Payment should be based on actual capacity procured in MWs as opposed to total Net Qualifying Capacity which can be much greater. CAISO should have ability to procure less than full capacity of a unit. CMUA - Do not oppose the $41/kW-year, no PER deduction approach. Object to policy direction that continues to not differentiate between seasonal value of capacity.	Support: Dynegy, Conditional: Constellation – Do not oppose the formula, but oppose the pricing. Oppose: Reliant - The RCST formula should be modified to reflect Eligible Capacity, the proxy value of capacity should be updated to reflect 2007 vintage data and peak energy rents should align with the proxy unit technology, operational characteristics and heat rate.	No Comment	Proposal describes how formula works and has been updated from RCST formula to work with new capacity price, including no deduction for peak energy rents. Formula also revised to allow for procurement of less than the total capacity of a resource (now using "Designated Capacity" term rather than Net Qualifying Capacity). The Availability Factors from RCST have now been included in proposal, and are used because they have already been approved by FERC for RCST.
13. Formula for Monthly Capacity Charge - Use formula in RCST. Have changed the Monthly Shaping Factor so that it is a level factor throughout the year. Formula is Monthly Shaping Factor times Target Capacity Price.	Support: TURN, PG&E, SCE CMUA - Do not oppose the $41/kW-year, no PER deduction approach. Object to policy direction that continues to not differentiate between seasonal attributes of capacity. No Comment: Six Cities, CLECA, AReM	Support: Constellation, Dynegy - Levelizing capacity payment has meaning/value only if designation is actually possible. It is only appealing if market prices reflect scarcity conditions and are not artificially dampened by CAISO extra-market actions. No Comment: Reliant, IEP	Support/	The Monthly Shaping Factor has been changed from what is in the RCST to now be a level factor (i.e., Target Annual Capacity Price of $41/kW-year would be divided by 12 to determine target monthly capacity price). This works better with a level payment that is intended to cover fixed costs.

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14. Allocation of Costs – Type 1 costs allocated only to deficient LSE (or LSEs) including any "lumpiness of procurement," except for procurement to address "effectiveness factors" which is spread among affected LSEs, with CEC forecast load used to determine load share. Type 2 costs allocated to affected LSEs in TAC area or areas, with actual load in each month from CAISO settlement system used to determine load share.	Support: PG&E, SCE Support: AReM – Support Type 1 cost allocation. Conditional Support: Six Cities – Support provided that allocation of Type 1 costs is done on basis of monthly LSE RA deficiencies. Conditional Support: CLECA - Concern about lumpiness factor. Lumps should be small as possible and cost-effectiveness assessment of procurement options should take into account minimization of procurement in excess of absolute need that would result from lumpiness. Oppose in Limited Part: TURN - Unfair to assess the cost of additional procurement for effectiveness to LSEs that have already over-procured in first instance where other LSEs were deficient. Oppose: AReM – Oppose Type 2 cost allocation. Costs should be allocated on a forecast basis, as is being done for Type 1 procurement. Believe this would improve the ability for a LSE to be able to claim a Type 2 procurement in its RA showing. CMUA requests clarification that CAISO will only procure what is necessary to meet ARC. CMUA does not oppose the write-up for the "lumpiness" issue.	Support: Constellation, Generally Support: Dynegy – For Dynegy, cost allocation is secondary to designation and payment terms, but costs should be allocated in a way to create greatest incentive to address deficiencies in RA requirements. No Comment: Reliant, IEP	Support	Broad support for overall proposal. Some were previously concerned that compliant LSEs could share in "lumpiness of procurement" costs; however have resolved this issue by revising proposal (no sharing). Proposal does not use CEC load forecast data for Type 2 procurement as actual load better follows cost causation, there is only limited support for using CEC forecast load, and use of CEC load does not solve "timing" issues related to LSEs possibly including Type 2 in RA showings (see #16).

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15. Selection among Multiple Resources – Use same criteria as in RCST for selection. Add new ability to designate a partial unit (under RCST must procure whole unit) and use of a random selection rule to break ties if eligible resources cannot be differentiated by their physical characteristics.	Support: PG&E, SCE - Support partial unit designations. Support: CLECA – Support designation of partial units and use of auction. Conditional Support: AReM - Concerned about how tie-breaker would interact with ability of generator to request higher payment through FERC filing. Should clarify how proposal will be modified to resolve issue. PG&E - Oppose simple tie-breaker auction; instead recommend use of a random selection rule. SCE - Does not appear necessary to introduce an auction to resolve ties. CAISO should pick resources that are most effective from grid operations perspective. CMUA has no position on this issue. No Comments: TURN , Six Cities,	Dynegy - Dynegy is skeptical about how CAISO would implement partial unit designations. A designation should not occur at a level less than that required by the CAISO to operate reliably. Conditional: Constellation – Do not oppose ability to designate partial units. Oppose auction process that allows entities to bid at or below the price cap. Reliant - When CAISO calls on a Generating Unit to maintain Applicable Reliability Criteria, a term payment for all Eligible Capacity associated with the Generating Unit should be triggered, with a must-offer obligation for the term of the CAISO procurement. No Comment: IEP	No Comment	Broad support for overall proposal. Some entities were concerned with prior proposal to use a simple auction to break ties. A random selection rule is now proposed, which is supported by several entities. A “tie” is expected to be a very rare occurrence. The CAISO believes the random selection rule is a reasonable method to address a potential situation that might only rarely arise.

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16. ICPM Procurement in RA Showings – Information would be provided to CPUC and LRAs on all ICPM procurement so that capacity procured can be considered by CPUC and LRAs and potentially allowed to count towards an LSE's RAR. Do not support allowing "Type 2" procurement to be included in RA showings.	Support: Six Cities, CMUA Support: PG&E, SCE, AReM – Support use of Type 1 procurement to off-set RA showings. Support: CLECA – Support, but why would Type 2 not be allowed to be included in RA showings? Oppose: PG&E, SCE – Oppose not allowing Type 2 procurement to off-set RA showings. Allowing it to count could lower collective need for system capacity. Oppose: AReM – Oppose proposal for Type 2. It should be allowed to be included in RA showings so that LSEs receive credit for ICPM capacity for which they have paid. No Comment: TURN,	Support: Dynegy - Allowing ICPM procurement to count towards meeting an LSE's RA requirements diminishes incentives to procure to meet forward showings, but it is likely that RA penalty mechanism, if effectively enforced, would counter this incentive. Support CAISO position to not allow Type 2 procurement to count in RA showings. Conditional Support: Constellation – Generally supports this feature, but Type 2 procurement for durations longer than 1 month should be potentially allowed to count in RA showings. Reliant - Allowing LSEs to count ICPM capacity against their RAR is a problem if CAISO is procuring ICPM capacity at a deep discount to cost of new entry.	Does not oppose. Does not now and is not considering giving CPUC jurisdictional LSEs RA counting "credit" for CAISO backstop procurement.	Support allowing all Type 1 procurement to be included in RA showings. Do not support allowing such treatment for Type 2 because the reason for Type 2 procurement is that the RA resources procured are insufficient to meet ARC and allowing it in RA showings would result in a decrease of available RA capacity and exacerbate conditions that lead to the procurement and potentially could cause additional ICPM procurement.

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List of Acronyms

ARC	Applicable Reliability Criteria
AReM	Alliance for Retail Energy Markets
CAISO	California Independent System Operator
CEC	California Energy Commission
CLECA	California Large Energy Consumers Association
Constellation	Constellation Energy Commodities Group, Constellation NewEnergy, Inc, and Constellation Generation Group, LLC
CPUC	California Public Utilities Commission
Dynegy	Dynegy Power Marketing, Inc.
FERC	Federal Energy Regulatory Commission
ICPM	Interim Capacity Procurement Mechanism
IEP	Independent Energy Producers Association
LCR	Locational Capacity Requirement
LRA	Local Regulatory Authority
LSE	Load Serving Entity
MORC	Minimum Operating Reliability Criteria
MRTU	Market Redesign and Technology Upgrade
MSC	Market Surveillance Committee
NERC	North American Electric Reliability Council
NRG	NRG Energy
PER	Peak Energy Rent
PGA	Participating Generator Agreement
PG&E	Pacific Gas and Electric Company
RA	Resource Adequacy
RCST	Reliability Capacity Services Tariff
Reliant	Reliant Energy, Inc.
RMR	Reliability Must-Run Agreement
RUC	Residual Unit Commitment
SCE	Southern California Edison Company
TAC	Transmission Access Charge
WECC	Western Electricity Coordinating Council