

Attachment D – Merged or No Longer An Issue

ISSUE #	ISSUE, INTERVENOR & CITE	RESOLUTION
1.	It is unclear how the ISO will reconcile the metering standards contained in Existing Contracts with those now proposed by the ISO. Comments and Protest of the Transmission Agency of Northern California ("TANC") to the October 31, 1997 Compliance Filings of the California Independent System Operator Corporation and California Power Exchange Corporation, Docket Nos. EC96-19-006, et al., filed November 21, 1997 ("TANC I") at 10.	No longer an issue requiring further action in this proceeding
3.	Ancillary Services Requirements Protocols: ISO should make numerous language changes as set out in Table 1 attached to BPA comments, in order to be able to implement the specified procedures in cases where the Ancillary Services are being offered by System Resources located outside the ISO grid. Motion to Intervene, Protest and Comments of the Bonneville Power Administration ("BPA") Regarding the California Independent System Operator Corporation and California Power Exchange Corporation Protocols, Pro Forma Agreements and Proposed Tariff Changes filed October 31, 1997, Docket Nos. ER96-19-006, et al., filed November 21, 1997 ("BPA I") at 7-10.	No longer an issue requiring further action in this proceeding
5.	Metering Protocol: Section 13.5.1(b)(l) of the MP unnecessarily and unduly discriminates against imports of Ancillary Services and unreasonably burdens tie points. BPA I at 13-15.	No longer an issue requiring further action in this proceeding
8.	Metering Protocol: Section 2.4 lacks an obligation of the ISO to promptly respond to requests for data and should be revised to provide one. Also, the meter data is the interest of the entity whose data was collected and transmitted to the ISO, not necessarily the Scheduling Coordinator that the entity engaged at the time. The language should be changed to reflect this. BPA I Table 3 at 1.	No longer an issue requiring further action in this proceeding
9.	Metering Protocol section 10.1: Changes to the validation, editing and estimation procedure should be subject to ISO Technical Advisory Committee approval and notice of proposed changes should be provided to all ISO Metered Entities. BPA I Table 3 at 1.	No longer an issue requiring further action in this proceeding
10.	Metering Protocol section 12.1: The second and third sentences seek to place an unnecessary and unreasonable burden on SC Metered Entities, and should be deleted. There is no justification for this requirement, particularly in the case of SC Metered Entities that represent only non-California entities. BPA I Table 3 at 1.	No longer an issue requiring further action in this proceeding
13.	Scheduling Protocol section 3.2.8.1(b): In subsection (b) it is unclear why the ISO will allow the submissions of revised ranges but not prices in a SC's Adjustment Bids. There is no apparent reason for this restriction. BPA I Table 3 at 2.	No longer an issue requiring further action in this proceeding
15.	Outage Coordination Protocol section 3.1.6: The Interconnected Control Area Agreement will set forth the entire agreement regarding the coordination of Maintenance Outages affecting the interconnection between the ISO and adjacent control areas. Section 3.1.6 should be deleted. BPA I Table 3 at 2.	No longer an issue requiring further action in this proceeding
16.	Outage Coordination Protocol section 5.2: The Interconnected Control Area Agreement will set forth the entire agreement regarding scheduling and approval of Maintenance Outages affecting the interconnection between the ISO and adjacent control areas. Section 5.2 should be deleted. BPA I Table 3 at 2.	No longer an issue requiring further action in this proceeding
18.	Dispatch Protocol section 3.8: The Interconnected Control Area Agreement will set forth the entire agreement between the ISO and Control Area Operators that are adjacent control areas regarding information or data to be supplied or exchanged, including metering data, and scheduling and checkout procedures for Interconnection schedules. Section 3.8 should be deleted in its entirety, to the extent that it applies to Control Area Operators that are adjacent control areas. BPA I Table 3 at 3.	No longer an issue requiring further action in this proceeding
19.		Merge with 224
20.	Outage Coordination Protocol section 5.3.2 overlaps with section 5.3.1. The section should be clarified to provide that it applies only to facilities not covered by section 5.3.1. Comments on Behalf of the Cities of Anaheim, Colton and Riverside, California and Asuza and Banning, California ("Southern Cities") on ISO Protocols, Pro Forma Agreements and Tariff Changes, Docket Nos. EC96-19-008 and ER96-1663-009, filed November 21, 1997 ("Southern Cities I") at 10.	No longer an issue requiring further action in this proceeding
23.	ASRP section 1.3.1(b) is inadequately defined and should specify which Operators are expected to abide by the Protocol. Southern Cities I at 11.	No longer an issue requiring further action in this proceeding
25.	Section 4.2 of the ASRP should be expanded to include System Resources. Southern Cities I at 11.	No longer an issue requiring further action in this proceeding
27.	Section 5.1.2 of ASRP should not be limited to only Generating Units. Southern Cities I at 12.	No longer an issue requiring further action in this proceeding
28.	The ISO's explanation of section 5.2 of the ASRP (software limitations) should not be dispositive. The ISO should be directed to weigh the burden imposed by the limitation against the cost of making necessary adjustments to the software. Southern Cities I at 12.	No longer an issue requiring further action in this proceeding

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29.	ASRP section 5.8.2 limiting procurement of Spinning and Non-Spinning Reserves to suppliers located within the ISO Controlled Grid could be extremely uneconomic and impose a significant burden on participants. Southern Cities I at 12.	No longer an issue requiring further action in this proceeding
31.	ASRP section 6.5.2 limits the supply of Replacement Reserve to providers located within the ISO Controlled Grid and may result in increased Ancillary Services costs to all Market Participants. Southern Cities I at 12.	No longer an issue requiring further action in this proceeding
32.	Section 7.3 of the ASRP should specify the consequences of failing to supply sufficient Voltage Support. Southern Cities I at 12.	No longer an issue requiring further action in this proceeding
33.	Subpart (b) of section 11.3 of the ASRP should be deleted. There is no apparent reason why a warning notice should expire prior to a retest; the mere passage of time is not likely to result in improved performance. Southern Cities I at 12.	No longer an issue requiring further action in this proceeding
36.		Merge with 162
37.	Preliminary and Final Settlement Statement potentially will contain commercially sensitive information that should <u>not</u> be available to all users of the WEnet, and section 8.1 and Appendix 1 (section 9.1) of the SABP should be modified. Southern Cities I at 14.	No longer an issue requiring further action in this proceeding
38.	Numerous sections in the Protocols refer to “requirements” set forth in Section 16 of the ISO Tariff. But that section of the Tariff in fact contains no requirements or standards. The previous drafts of these sections are more appropriate. Southern Cities I passi.	No longer an issue requiring further action in this proceeding
39.	Section 3.1.4 of the MP should direct the ISO to make the Technical Specifications available for review. Southern Cities I at 14.	No longer an issue requiring further action in this proceeding
42.	The proposed form of software licensing (discussed in section 5.1(b) of the SCAP) should be made available for review and comment by potential SCs and other interested parties. Southern Cities I at 15.	No longer an issue requiring further action in this proceeding
44.	Additional language should be added to section 7.3 and Appendix A of SCAP to make clear that although a SC should commit to compliance with duly adopted ISO procedures and protocols, it does not give up its rights to challenge or request changes to such procedures and protocols. Southern Cities I at 15 and 16.	No longer an issue requiring further action in this proceeding
48.		Merge with 12
50.	Proposed Emergency Guidelines and Load Shedding and Load Restoration priorities (discussed in sections 10.2.4 and 10.2.7 of the DP) should be made available promptly for review and comment by participants. Southern Cities I at 19.	No longer an issue requiring further action in this proceeding
51.		Merge with 12
52.	Section 2.2.4.7.1 of the Tariff is unclear. The language “will receive service at UDC rates” is inappropriately vague and ambiguous. Southern Cities I at 20.	No longer an issue requiring further Commission action in this proceeding
55.	NYMEX is concerned that the coordination between the ISO and PX, under the proposed Market Monitoring and Information Protocol, will be so pervasive as to blur the operational lines between these two entities. By law, the ISO and PX are required to remain independent of each other. Comments of the New York Mercantile Exchange, Docket Nos. EC96-19-006, et al., filed November 21, 1997 (“NYMEX”) at 3	No longer an issue requiring further Commission action in this proceeding
60.	The ISO Tariff should not compel any Participating Transmission Owner to violate restrictions applicable to facilities that are part of a system financed with Local Furnishing Bonds. SDG&E requests that the following language be inserted at the beginning of Dispatch Protocol: section 8.5: “Subject to Section 1.2.3 of the ISO Tariff and related ISO protocols and operating procedures.” This language safeguards any financing that Participating Transmission Owners have secured with tax-exempt Local Furnishing Bonds. Intervention and Protest of San Diego Gas & Electric Company, Docket Nos. EC96-19-008 and ER96-1663-009, filed November 21, 1997 (“SDG&E”) at 12.	No longer an issue requiring resolution in this proceeding
61.		Merge with 78
62.		Merge with 61
63.		Merge with 61

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68.	MMIP 2.3.3 in appropriate circumstances permits the Market Surveillance Unit to institute ADR procedures involving Participants to determine whether a particular practice is better characterized as improper gaming or legitimate aggressive competition. This should not be a matter subject to ADR. The monitoring protocols set up elaborate committees and their judgment should not be subject to ADR. <i>Motion to Intervene of the Northern California Power Agency ("NCPA"), Protest, Request for Further Proceedings, and Motion for Summary Modification Or Rejection of ISO Submission, Docket Nos. EC96-19-008 and ER96-1663-009, filed November 21, 1997 ("NCPA I") at 10-11.</i>	No longer an issue requiring further Commission action in this proceeding
69.	Amendments to sections 2.5.28.1 and 2.3.4.4.2 of the ISO Tariff are not explained. NCPA I at 11.	No longer an issue requiring further Commission action in this proceeding
72.		Merge with 2
74.	Strict reading of amended Section 2.5.20.1 would require SMUD to pay for reserves twice, both on firm purchases and pursuant to the reserve requirement of the ISO. SMUD I at 8.	No longer an issue requiring further action in this proceeding
76.	Amended Sections 2.5.6.2 and 2.5.22.10 pass off added responsibilities to Scheduling Coordinators. The Scheduling Coordinators will undoubtedly claim that their costs are increasing (without any corresponding decrease in costs to the ISO). Such costs could then be passed on through the GMC. This subsequently will result in the failure to match cost responsibility with cost causation. SMUD I at 11-12.	No longer an issue requiring further action in this proceeding
77.	Revised definition of the "Existing Operating Agreement" would limit the formation of MSSs to those agreements entered into between the ISO and Existing Operating Entities prior to the ISO Operations Date. No explanation as to why such a limitation is justified. SMUD I at 12.	No longer an issue requiring further action in this proceeding-ISO to remove EOA provisions
81.	SBP addresses changes to the operating instructions that RPTOs submit on behalf of holders of Existing Rights. It is entirely possible that this presents a violation of Existing Rights, and if so, must be revised. SMUD I at 23-24.	No longer an issue requiring further action in this proceeding
84.	DP 6.9 is very general and understanding of how the ISO will implement this function is not given. SMUD provides language suggestions. SMUD I at 25-26.	No longer an issue requiring further action in this proceeding
85.	DP 6.9.2(c) leaves only the ISO to resolve problems with the ISO Control Area. The ISO must also have the responsibility and authority to instruct other subregions to take corrective action to ensure reliability of the grid. SMUD I at 25.	No longer an issue requiring further action in this proceeding
86.	DP 7 and DP 8.1 do not recognize Existing Right and Non-Converted Rights holders within the hour scheduling rights. SMUD I at 26.	No longer an issue requiring further Commission action in this proceeding
87.	DP 10 proposes a prioritized schedule for shedding and restoring load and adjusting generation to manage Emergencies. One of the most likely Emergencies is the loss of transmission ties. The ISO must put the restoration of transmission ties as the first priority, then the restoration of load. SMUD I at 26-27.	No longer an issue requiring further action in this proceeding
88.		Merge with 89
91.	The ISO, in the Outage Coordination Protocol, must defer to generators' existing maintenance schedules when coordinating maintenance outages so as not to impose additional conditions or burdens on these facilities. ECI I at 6 and 9.	No longer an issue requiring further action in this proceeding
92.	ASRP 5.8.2 and ASRP 6.5.2 are objectionable. Scheduling Coordinators must be permitted the flexibility to procure ancillary services from outside the ISO controlled grid. ECI I at 6.	No longer an issue requiring further action in this proceeding
93.	Scheduling Coordinators, under section 8.1 of the SABP, must not be forced to invest in systems to accommodate the processing of ISO invoices via EDI. This procedure is burdensome and unnecessary. ECI I at 6 and 12-13.	No longer an issue requiring further action in this proceeding
94.	ASRP section 4.3 refers to Regulation by Zone. It is unclear why the ISO seeks to define Regulation by Zone, inasmuch as the physics of the system as a whole will determine whether there is an area control error (ACE) for the entire grid. The ISO should be required to clarify why it apparently intends to control based on Zones rather than the ACE for the entire grid. ECI I at 10.	No longer an issue requiring further action in this proceeding
98.	New Section 2.2.7.6 of the Tariff cannot be reviewed at this time because the Existing Operating Agreements do not yet exist. To Edison's knowledge, there are no Existing Operating Agreements in existence and it is not possible to determine whether it is reasonable to permit such agreements to supersede the ISO Tariff. Edison at 11.	No longer an issue requiring further action in this proceeding. ISO to remove EOA provisions

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100.	Changes to Section 2.5.28.4 of the Tariff were done without explanation. Without any information, it is impossible to determine whether the changes are just and reasonable. Protest and Comments of the Northern California Power Agency, Docket Nos. EC96-19-010 and ER96-1663-011, filed December 4, 1997 ("NCPA II") at 8.	No longer an issue requiring Commission resolution in this proceeding
101.		Merge with 414
102.	Proposed amendment to Section 11.2.4.1 of the Tariff consists primarily of unexplained formulae and changes. NCPA II at 8-9.	No longer an issue requiring further Commission action in this proceeding
103.	The provision providing that the EOA will prevail over the SP should be expanded to include any agreement. TANC I Appendix A at 1.	No longer an issue requiring further action in this proceeding. ISO to remove EOA provisions
104.	SP sections 3.1.1, 4.1 and others do not provide justification for the changes to the concept of "Balanced Schedules" as defined in the Master Definitions Supplement. At a minimum, the SP should provide more clearly that the "Balanced Schedules" of Metered Subsystems and other existing operating entities will be measured by net load. TANC I Appendix A at 1.	No longer an issue requiring further action in this proceeding
105.		Merge with 12
108.		Merge with 318
109.		Merge with 644
110.	Section 7.1.2 of the SP should provide that an Existing Rights holder may be an SC or may use an SC other than a RPTO. TANC I Appendix A at 2.	No longer an issue requiring further action in this proceeding
111.	The ISO should make clear that TANC's transmission service under the South of Tesla Principles will be treated as "firm" under the SP and ISO Tariff. TANC I Appendix A at 2.	No longer an issue requiring further action in this proceeding
113.		Merge with 251
114.	The SP (section 9) is not clear as to why the SP repeats the Ancillary Services bidding and pricing provisions from the ISO Tariff, particularly when those provision are not repeated in identical form. It appears that there is the possibility of unnecessary inconsistency in those provisions. TANC I Appendix A at 3.	No longer an issue requiring further action in this proceeding
117.	The Protocols' references to the Balancing Energy and Ex-Post Pricing software should be more fully explained. TANC I Appendix A at 3 and 6.	No longer an issue requiring further action in this proceeding
119.	Sections 2.1.1(e) and 2.1.3(i) of the SBP should recognize that Generating Units owned by Local Publicly Owned Electric Utilities that serve native load are a special category not subject to Overgeneration Protocols. TANC I Appendix A at 4.	No longer an issue requiring further action in this proceeding
121.	Section 2.1.4 of the SBP appears to overlook the operational reality that some SCs may not be TOs and thus their transmission rights may not be subject to Usage Charges and their transactions not subject to ISO congestion management operations or charges. The provision should be revised to account for the foregoing. TANC I Appendix A at 4.	No longer an issue requiring further action in this proceeding
122.	SBP section 3.2 should provide more clearly for the possibility that a service recipient may have the right to schedule directly to the ISO. TANC I Appendix A at 5.	No longer an issue requiring further action in this proceeding
123.	Section 3.3.1 and the Appendix to the SBP proposes information requirements and electronic format that do not appear to fully account for the complexity associated with operations relating to the California-Oregon Transmission Project or service pursuant to the South of Tesla Principles. They should provide for the provision of more detailed information for those Existing Contracts that are not amendable to the simple categorizations specified. TANC I Appendix A at 5.	No longer an issue requiring further action in this proceeding
126.	Sections 6.2, 6.4 and 7.2 of the SBP and reference to the "ISO Data Templates and Validation Rules document" should be clarified. TANC I Appendix A at 5.	No longer an issue requiring further action in this proceeding
127.	Section 7.1 of the SBP and the "technical aspects" of the ISO communication mechanisms should be specified by the ISO. TANC I Appendix A at 5.	No longer an issue requiring further action in this proceeding

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129.	Sections 6.2.1, 6.2.2 and 6.2.3 of the DP should provide for review of the ISO Register of PTO transmission facilities over which it proposes to accept control, including facilities below 230kV. Moreover, the DP should incorporate provisions setting forth the ISO's proposed method of exercising Operational Control over facilities that may be owned jointly by PTOs and Non-PTOs. TANC I Appendix A at 6.	No longer an issue requiring further action in this proceeding
130.	Section 6.4 of the DP should not place the ISO in the position of directing PTO exercise of operation and maintenance functions in non-emergency conditions. TANC I Appendix A at 6.	No longer an issue requiring further action in this proceeding
133.	The allocation of Regulation should allow for the exclusion of self-provided Regulation and/or be based on net Demand scheduled with the ISO. Section 4.3 of the ASRP should be modified. TANC I Appendix A at 8.	No longer an issue requiring further action in this proceeding
136.	The ISO needs to establish the "Technical Specifications" for metering standards (in the MP) and the technical standards for certification and registration of revenue quality meters as soon as possible. TANC I Appendix A at 9.	No longer an issue requiring further action in this proceeding
137.	The definition of "Scheduling Coordinator Metered Entity" (section 1.2.2 of the MP) is over-inclusive, in that it applies to entities that have no connection to the ISO. TANC I Appendix A at 9.	No longer an issue requiring further action in this proceeding
138.		Merge with 120
139.	The MP (section 3.1.8) should provide a more complete description of the process for revocation of certification of a Certificate of Compliance for a meter. TANC I Appendix A at 9.	No longer an issue requiring further action in this proceeding
141.	Section 6.1.2 of the MP imposes tight deadlines for meter repair, but it does not specify what action the ISO intends to take in the event repairs are not completed by the deadlines. TANC I Appendix A at 9.	No longer an issue requiring further action in this proceeding
142.	Section 9.1.2 of the MP, giving the ISO control over metered entities' rights to grant access to meter data, appears overly restrictive. TANC I Appendix A at 9.	No longer an issue requiring further action in this proceeding
143.	The ISO should publish its proposed guidelines for granting exemptions from metering requirements (section 13.2(a) of the MP) as soon as possible. TANC I Appendix A at 9.	No longer an issue requiring further action in this proceeding
144.	The term "Direct Access" in the SCAP is not defined. TANC I Appendix A at 10.	No longer an issue requiring further action in this proceeding
145.	The grounds for ISO rejection of an SC application should be limited to noncompliance with material requirements. Section 3.1(b) of the SCAP should be modified. TANC I Appendix A at 10.	No longer an issue requiring further action in this proceeding
146.	The SCAP should specify the time for signing the SC Agreement. TANC I Appendix A at 10.	No longer an issue requiring further action in this proceeding
147.	The ISO must provide the form of its proposed software licensing agreement in section 5.1(b) of the SCAP. TANC I Appendix A at 10.	No longer an issue requiring further action in this proceeding
148.	The potential requirement for software for the purpose of Validating, Estimating and Editing meter values must be explained in the SCAP sections 5.1(c) and 1.2.2. TANC I Appendix A at 10.	No longer an issue requiring further action in this proceeding
149.	The requirement of "LAN" service for "EDI" must be explained in the SCAP in explicit detail, including identification of the LAN service intended and the EDI requirements anticipated. Also, the cost of that requirement should be provided. TANC I Appendix A at 10.	No longer an issue requiring further action in this proceeding
150.		Merge with 43
151.	The Application in the SCAP should make clear what form of certification by a rating agency is acceptable to the ISO. The Application should also clarify the requirement of the "executed letter of understanding for payment." TANC I Appendix A at 10.	No longer an issue requiring further action in this proceeding
152.	The Application requirement of an Electronic Funds Transfer Account should be specified in more detail in the SCAP. TANC I Appendix A at 10.	No longer an issue requiring further action in this proceeding
153.	The Application (in the SCAP) should make clear what form of confirmation of Scheduling Coordinator authority will be acceptable. TANC I Appendix A at 11.	No longer an issue requiring further action in this proceeding
154.	The Application in the SCAP should place limits on the "further information" that an Applicant may be required to provide the ISO. TANC I Appendix A at 11.	No longer an issue requiring further action in this proceeding

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155.	Section 5.1.4 of the Tariff specifies that the exemption for Generating Units of less than 10 MW is available only to those units selling their total output to a UDC or to customers connected to the UDC's system. Sections 1.3.2, 2.1 and 4.4.1 of the OCP should be modified. TANC I Appendix A at 12.	No longer an issue requiring further action in this proceeding - subject to check
156.	The references (sections 4.3.5, 4.4.6, 5.6 and 5.9 of the OCP) to the ISO's "security standards, security concerns," and ability to withhold Final Approval of an Outage for reasons of "security or system status of the ISO Grid" should be clarified to specify what circumstances those references anticipate. TANC I Appendix A at 12.	No longer an issue requiring further action in this proceeding
157.	Sections 7.3 and 7.4 of the OCP regarding the ISO's communications to Operators or Participating Generators should be clarified as to what forms of communications are acceptable. It does not seem to be necessary that the ISO communicate in the same form as communications that it may receive. TANC I Appendix A at 12.	No longer an issue requiring further action in this proceeding
158.	Section 2.1 of the DFP should make clear that SC demand forecasts are not intended to be binding commitments or obligations. TANC I Appendix A at 13.	No longer an issue requiring further action in this proceeding
160.	Section 2.2.6 of the SABP does not seem necessary. It is not necessary for the ISO to "reasonably accept" a bank that meets the stated standards. TANC I Appendix A at 14.	No longer an issue requiring further action in this proceeding
162.	Section 6.10.3 of the SABP should provide more direct notice to, and recourse for, customers of defaulting SCs than posting of a notice on the ISO Home Page. TANC I Appendix A at 14. Section 6.10.3 of the SABP is inadequate and does not protect the rights of all customers that depend upon the SC being terminated. Southern Cities I at 13.	No longer an issue requiring further action in this proceeding
164.	Section 1.3.1 of the MMIP should apply to the PX as well as other participants. TANC I Appendix A at 15.	No longer an issue requiring further action in this proceeding
165.	Section 2.2.1 of the MMIP should identify more clearly the issues that have been raised regarding short-term horizontal market power during the transition phase. TANC I Appendix A at 15.	No longer an issue requiring further action in this proceeding
166.	Section 3.3.5 of the MMIP should require that an investigation be conducted when a complaint is received. TANC I Appendix A at 15.	No longer an issue requiring further action in this proceeding
167.	Section 4.1. of the MMIP should specify early dates for commencement of the functions of the ISO Market Surveillance Unit. TANC I Appendix A at 15.	No longer an issue requiring further action in this proceeding
168.	Section 5 of the MMIP should make some provisions for some staff to support the activities of the 3 members of the Market Surveillance Committee. TANC I Appendix A at 15.	No longer an issue requiring further action in this proceeding
170.	Section 8.2 of the MMIP should include provisions for the publication of quantities associated with transactions. TANC I Appendix A at 15.	No longer an issue requiring further action in this proceeding
171.		Merge with 318
172.		Merge with 318
173.	The purpose behind the amendment to Section 2.2.10.8 of the Tariff seems antithetical to the ISO's market approach. TANC I Appendix B at 2.	No longer an issue requiring further action in this proceeding
175.	Section 7.4.1 of the Tariff: The ISO cannot initially provide losses, so section 7.4.1 should add ISO undertaking to provide all Ancillary Services as soon as possible. TANC I Appendix B at 2.	No longer an issue requiring further action in this proceeding
177.	The deletion of language in Section 11.4.3(g) of the Tariff deletes a crucial item of information. TANC I Appendix B at 3.	No longer an issue requiring further resolution in this proceeding
179.	ISO protocols are inconsistent with ISO Tariff, contains ambiguous terms, and reflect errors that should be corrected. Suggested changes to Protocols contained in Appendix A. Comments and Protest of the Metropolitan Water District of Southern California to the October 31, 1997 Compliance Filings of the California Independent Operator System Corporation and California Power Exchange Corporation, Docket Nos. EC96-19-006, et al., filed November 21, 1997 ("Metropolitan I") at Executive Summary.	No longer an issue requiring further action in this proceeding

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180.	Proposed access to Meter Data Acquisition System (MDAS) is unclear. Many equally credible interpretations can be made in Revised Staging Plan No. 1 in regards to the access to the MDAS. Motion to Intervene, Protest and Comments and Motion for Clarification of the Bonneville Power Administration Regarding the California Independent System Operator Corporation and California Power Exchange Corporation Proposed Tariff Amendments Filed November 21, 1997, Docket Nos. EC96-19-010, et al., filed December 10, 1997 (“BPA II”) at 4-5.	No longer an issue requiring further action in this proceeding
181.	Amendment to the definition of “Congestion” to include “real time” conditions is problematic. First, the change appears to be permanent although no reason is given for it. To the extent that the algorithm unintentionally drives a change in the Tariff that may not be desirable, what steps are being taken to correct it? Second, it is not clear how the real time Congestion management will be implemented. Third, no indication is given as to how real time inter-zonal Congestion would be managed, if at all. And fourth, it is not clear that the ISO does not intend to manage Congestion at tie points in real time. BPA II at 8-11.	No longer an issue requiring further action in this proceeding
182.	The ISO’s proposed amendments to Ancillary Services Bid Evaluation discriminate against parties importing Ancillary Services into the ISO Control Area. BPA II at 11-12.	No longer an issue requiring further action in this proceeding
183.		Merge with 245
184.		Merge with 2
185.	In changes proposed in the ISO’s November 21, 1997 tariff amendments, the ISO is proposing new definitions that may or may not be consistent with the August 15 revisions that made DWR eligible for MSS status. Protest and Request for Further Procedures of the California Department of Water Resources (“DWR”), Docket Nos. EC96-19-010 and ER96-1663-011, filed December 4, 1997 (“DWR I”) at 3.	No longer an issue requiring further action in this proceeding
186.	Changes proposed in the ISO’s November 21, 1997 tariff amendments eliminate competitive provisions of Ancillary Services to the ISO, revise Settlement and Billing provisions to, among other things, reduce the amount of information provided in Preliminary Settlement Statements and the amount of time Market Participants have to review them, apply a within-Zone approach to Ancillary Services obligations and charges, and revise provisions affecting Existing Contracts. DWR I at 4.	No longer an issue requiring further action in this proceeding
187.	Tariff Amendment No. 4: The definition of terms for actual imports and actual exports in the calculation of Imbalance Energy is unclear. Motion to Intervene and Comments of The Bonneville Power Administration Regarding The California Independent System Operator Corporation’s Proposed Tariff Amendment No. 4 Filed March 3, 1998, Docket Nos. EC96-19-017 and ER96-1663-018, filed March 16, 1998, (“BPA III”) at 3-5.	No longer an issue requiring further action in this proceeding
188.	Tariff Amendment No. 4: The treatment of wheel-through transactions is ambiguous; ISO should clarify its practices with regard to certain curtailment situations. BPA III at 5-7.	No longer an issue requiring resolution in this proceeding
191.	Tariff Amendment No. 4: The proposal to resolve mismatches in the scheduled quantity or location of Inter-Scheduling Coordinator Trades has the effect of decreasing the incentive for submission of balanced trade. The ISO should furnish additional information on the impact of this proposal on Scheduling Coordinators. Metropolitan II at 5-6.	No longer an issue requiring further action in this proceeding
192.	Tariff Amendment No. 4: Concerning Wheeling Access Charge, objects to ISO posting amendments of filed rates or rate schedules on the ISO Home Page. The effectiveness of rates that are accepted subject to FPA should be determined by reference to rate schedules on file with FERC rather than by notice on private web site. Metropolitan II at 8-9.	No longer an issue requiring further action in this proceeding
193.	Tariff Amendment No. 5: the proposal leaves unanswered the potential impacts for the interrelationship of the ISO’s proposal with other amendments and provisions of the ISO, particularly the impact on the Imbalance Energy market. Comments on Amendment No. 5 to the ISO Tariff of the Metropolitan Water District of Southern California, Docket Nos. EC96-19-018 and ER96-1663-019, filed March 16, 1998 (“Metropolitan III”) at 4-5. Protest and Comments on Amendment No. 5 to the ISO Tariff of the Transmission Agency of Northern California, Docket Nos. EC96-19-018 and ER96-1663-019, filed March 16, 1998 (“TANC II”) at 4.	No longer an issue requiring further action in this proceeding (see issue 194)
194.	Tariff Amendment No. 5: ISO has not explained whether the Imbalance Energy Market will be sufficiently robust to accommodate the variances permitted by Amendment No. 5 between schedules and real time operations. The impact on Congestion Management in the Day-Ahead and Hour-Ahead markets is not considered and the potential for greater reliance on real time Congestion Management is not explained. TANC II at 5.	No longer an issue requiring further action in this proceeding
195.	Tariff Amendment No. 6: Correction to bill calculations procedure is not clear on how charges would be applied to transactions covered under existing contracts; the adjustments would result in unjust and unreasonable charges to Scheduling Coordinators. Motion to Intervene and Protest by the Western Area Power Administration, Docket Nos. EC96-19-021 and ER96-1663-022, filed April 7, 1998 (“WAPA”) at 4-6.	No longer an issue requiring further Commission action in this proceeding

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196.	<p>Tariff Amendment No. 6: The ISO has not justified its proposed temporary change to the Real-Time Market for Imbalance Energy, and the proposed changes to the Imbalance Energy pricing mechanism raise significant concerns. If accepted, the definitions of “BEEP Interval Ex Post prices” and “Uninstructed Imbalance Energy” require clarification. Protest to Amendment No. 6 to the ISO Operating Agreement and Tariff and Protocols and Request for Suspension and Hearing of the Metropolitan Water District of Southern California, Docket Nos. EC96-19-021 and ER96-1663-022, filed April 9, 1998 (“Metropolitan IV”) at 7 and 10-11.</p>	No longer an issue requiring further Commission action in this proceeding
198.	<p>Tariff Amendment No. 6: the proposed changes regarding Overgeneration Management are inconsistent with prior orders and are discriminatory. Numerous intervenors in Docket Nos. EC96-19-021 and ER96-1663-022 (each filed April 9, 1998), including: Motion to Intervene and Protest of Enron Power Marketing, Inc. (“Enron II”); Protest, Motion to Reject, In Part, and Request for Hearing of the Transmission Agency of Northern California (“TANC III”); Protest of the California Department of Water Resources to Amendment 6 (“DWR III”); and Motion to Intervene of Turlock Irrigation District (“Turlock III”).</p> <p>Metropolitan IV at 12-15, Enron II at 10-11, TANC III at 3-5, DWR III at 2-3, Turlock III at 3, Cities at 5-7.</p> <p>Tariff Amendment No. 6: The Overgeneration proposal does not comply with FERC’s October 30 directive that Scheduling Coordinators address their own Overgeneration problems. Protest by the Sacramento Municipal Utility District to Amendment No. 6 of the ISO Operating Agreement and Tariff, Docket Nos. EC96-19-021 and ER96-1663-022, filed April 9, 1998, (“SMUD II”) at 3.</p> <p>Overgeneration Issues Should Not Impinge Upon Existing Contracts. EC96-19-029 & ER96-1663-030, Comments and Protest of DWR, p. 41 filed 08/05/1998.</p>	For Metropolitan only -No longer an issue requiring further Commission action in this proceeding. This issue is also listed in Appendix G.
199	<p>Tariff Amendment No. 6: The proposed changes to give load an implicit priority in congestion management violate the terms of existing contracts, are inconsistent with FERC orders and must be rejected. Metropolitan IV at 16, TANC III at 5-6, Motion to Reject, In Part, Protest and Request for Hearing Regarding Amendment No. 6 to the ISO Operating Agreement and Tariff Submitted on Behalf of the Cities of Redding and Santa Clara, California, and the M-S-R Public Power Agency, Docket Nos. EC96-19-021 and ER96-1663-022, filed April 9, 1998 (“Cities/M-S-R 4/9/98”) at 7.</p> <p>ISO Tariff Provisions That Give Load An Implicit Priority In Congestion Management Violate Existing Contracts, Are Inconsistent With Commission Orders, And Must Be Rejected. EC96-19-029 & ER96-1663-030, Comments and Protest of DWR, p. 39 filed 08/05/1998.</p>	For Metropolitan only -No longer an issue requiring further Commission action in this proceeding. This issue is also listed in Appendix G.
200.	<p>Amendment No. 6: Clarification required of Default Usage Charge (“DUC”) “day-prior notice” language. Metropolitan IV at 16.</p>	No longer an issue requiring further Commission action in this proceeding
201.	<p>Tariff Amendment No. 6: ISO has not adequately explained proposed revisions to Appendices B and H to the Settlement and Billing Protocol. Metropolitan IV at 17.</p>	No longer an issue requiring further action in this proceeding
202.	<p>Tariff Amendment No. 6: ISO must clearly state the procedures and the priority of those procedures it will use in an effort to avoid aborting the Day-Ahead Market. Interventions in Docket Nos. EC96-16-021 and ER96-1663-022 (each filed April 9, 1998), including: Metropolitan IV at 18, TANC III at 7; Protest on Behalf of the Cities of Anaheim, Colton, and Riverside, California and the Cities of Azusa and Banning, California (“Southern Cities II”) at 4-5; Notice of Intervention and Comments of the Public Utilities Commission of the State of California (“CPUC”) at 6-7; and Motion to Intervene and Comments of The Bonneville Power Administration Regarding The California Independent System Operator Corporation’s Proposed Tariff Amendment No. 6 Filed March 23, 1998 (“BPA IV”) at 4-6.</p>	No longer an issue requiring further action in this proceeding
203.		Merge with 403
206.		Merge with 198

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207.	Tariff Amendment No. 6: ISO should clarify the role of Supplemental Energy bids in its real-time Overgeneration Management. Motion to Intervene and Comment of Los Angeles Department of Water and Power on California Independent System Operator Corporation's March 23, 1998 Filing (Amendment No. 6), Docket Nos. EC96-19-021 and ER96-1663-022, filed April 9, 1998 ("LADWP") at 3.	No longer an issue requiring further Commission action in this proceeding
209.		Merge with 205
210.		Merge with 205
211.		Merge with 205
212.	Tariff Amendment No. 6: Sections 2.3.4.2 and 2.3.4.3 should be modified to establish that both Scheduling Coordinators and adjacent Control Areas will be offered the identical ability to purchase energy at negative prices prior to ISO taking action under Section 2.3.4.4. Enron II at 11. Tariff Amendment No. 6: ISO proposal in transmittal letter that in certain conditions it will attempt to eliminate Overgeneration by exports of Energy to one or more adjoining Control Areas at no cost or negative price should also be extended to within the ISO Control Area. Turlock III at 3-4.	No longer an issue requiring further action by the Commission in this proceeding
214.	Tariff Amendment No. 6: Further clarification is required on the justification for paying Instructed Units the highest incremental energy price upon ISO dispatch of the Units to supply the Real-Time Imbalance Market. CPUC at 6.	No longer an issue requiring further action in this proceeding
215.	Tariff Amendment No. 6: Clarification required regarding the pricing structure for Supplemental Energy and energy supplied by Ancillary Services. CPUC.	No longer an issue requiring further action in this proceeding
216.	Tariff Amendment No. 6: Issues related to Congestion Management remain unclear. CPUC.	No longer an issue requiring further action in this proceeding
218.	Tariff Amendment No. 6: Proposed changes to Settlement and Billing Protocol, Appendix C, section C.2.2.3 of relating to Replacement Reserve capacity Charges is inconsistent with cost causation and self-provision concepts. TANC III at 7.	No longer an issue requiring further action in this proceeding
219.	Tariff Amendment No. 6: Section 11.2.4.2 proposed change to avoid System Emergencies violates WSCC practices and procedures as they relate to imports, and the term "imports" should be struck. BPA IV at 3.	No longer an issue requiring further action in this proceeding
221.		Merge with 265
227.	Tariff Amendment No. 6: Settlement and Billing Protocol Appendix H term "SCPUOT" needs clarification. PG&E at 11.	No longer an issue requiring further action in this proceeding
230.		Merge with 212
237.	Utilities should be able to execute the EOA after the ISO Operations Date (EOA §§ 3.4, 8.1). Turlock 11/21/97 at 10.	No longer an issue requiring further action in this proceeding. ISO to remove EOA provisions
238.	The EOA requires more data than necessary for the ISO to effectively operate its system (e.g., Sections 3.4, 4.3 call for information that is unit specific, and not in accord with the System Unit concept). Turlock 11/21/97 at 11-12.	No longer an issue requiring further action in this proceeding. ISO to remove EOA provisions
239.	EOA § 9.1 would allow the sanction of suspension of trading rights, and EOA § 12.1 provides one-way, rather than bilateral liability and indemnification. Turlock 11/21/97 at 13.	No longer an issue requiring further action in this proceeding. ISO to remove EOA provisions
240.	The GMC should only be applied to use of the ISO Controlled Grid (ISO Tariff § 8.3). TID 11/21/98 at 17-18.	No longer an issue requiring further action in this proceeding. Removal is without prejudice to raising concern in a subsequent GMC filing.
241.	Potential Metered Subsystems should not be required to execute an EOA by the ISO Operations Date. Turlock Irrigation District's Dec. 3, 1997 comments, filed in Docket Nos. EC96-19-010, ER96-1663-011 ("TID 12/04"), at pages 4-6.	No longer an issue requiring further action in this proceeding. ISO to remove EOA provisions

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242.	Turlock noted that several of the agreements tendered in Docket Nos. EC96-19-012, ER96-1663-013 did not include the completed schedules. Turlock Irrigation District's comments dated Jan. 16, 1998 ("TID 01/16") at 3-4.	No longer an issue requiring further action in this proceeding
244.		Merge 248
247.	The ISO should explain and provide details of how it proposes to control the output of Generating Units and Interconnection schedules under DP 9.1.1. Turlock 7/30/98 at 4-5.	No longer an issue requiring further action in this proceeding
249.	The ISO's proposal to delete from Section 2.5.3.1 reference to System Resources from the resources capable of providing Regulation Service to the ISO, fails to recognize that System Units can provide Regulation Service. SMUD II at 5.	No longer an issue requiring further action in this proceeding
250.	The ISO has failed to revise the definition of "Existing Operating Agreement" as required by the Commission's December 17, 1997 Order. SMUD II at 5-6.	No longer an issue requiring further action in this proceeding. ISO to remove EOA provisions
255.	SMUD proposes that the ISO add a new Section 1.3(f) to the ISO Tariff which would state as follows: 1.3 In this ISO Tariff, unless the context otherwise requires...(f) where terms of the ISO Protocols or <i>Pro Forma</i> Agreements are inconsistent or conflict with terms of the ISO Tariff, the terms of the ISO Tariff shall provide guidance in interpreting such inconsistency or conflict. SMUD II at 10-12.	No longer an issue requiring further action in this proceeding
256.	SMUD notes that there must be a stated manner in the ISO Tariff by which inconsistencies in the Tariff, Protocols and <i>Pro Forma</i> Agreements should be read, as mandated in the Commission's December 17 Order. SMUD II at 11-12.	No longer an issue requiring further action in this proceeding
257.	The term "Scheduling Coordinator Metering Entity" in the ISO Tariff should be eliminated as not responsive to FERC orders. SMUD II at 12.	No longer an issue requiring further action in this proceeding
258.		Merge with 2
259.		Merge with 366
260.	Section 2.5.22.8 of the ISO Tariff on Intra Zonal Congestion change permitting the ISO "to direct the redispatch of resources within the Zone" in the event that no incremental or decremental bids are available to alleviate intra-zonal congestion impermissibly grants the ISO control over generation that is not participating in the market. This authority is also at odds with Section 5.1.3. These modifications do not do what was required in the Commission's October 30, 1997 Order requiring the ISO to file comprehensive Intra-Sonal Congestion Management Protocols so that the Commission and Market Participants can understand how such congestion is managed by the ISO. SMUD's August 17, 1998 Intervention and Protest in ER98-3760, at 5-8 (SMUD III)	No longer an issue requiring further action in this proceeding (see 530)
261.	SBP4, Adjustment Bids modification does not comply with the ISO's process for handling Overgeneration and should not be used to manage Intra-Zonal Congestion and Overgeneration. SMUD III at 8.	No longer an issue requiring further action in this proceeding
262.		Merge 197
263.		Merge with 205
264.	Tariff Amendment No. 6. The ISO Software will change SC Adjustment Bids in at least two circumstances, causing misallocation of ATC, sub-optimal redispatch during congestion management and higher prices in the PX. Attachment 2 provides an analysis of the problem. PX at 9-12 and Attachment 2.	No longer an issue requiring further Commission action in this proceeding
268.	Tariff Amendment No. 8. The ISO Tariff does not give it the authority to require all Scheduling Coordinators to include RMR dispatch in their Hour-Ahead Schedules. The PX software will not support the proposed requirement. The matter of financial settlements has not been resolved and would be compounded by the ISO's proposed requirement. PX Protest filed 6/8/98 at 2-5.	No longer an issue requiring further Commission action in this proceeding
273.	ASRP improperly double counts the reserve obligation for imports. BPA I at 10.	No longer an issue requiring further action in this proceeding

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274.		Merge with 64
278.	Identify how Inter-Scheduling Coordinator Trades where Scheduling Coordinators portfolios contain only Inter-Schedule Coordinator Trades (ISO Tariff section 2.2.11.3.4). BPA Comp Filing at 7.	No longer an issue requiring further action in this proceeding
284.		Merge with 22
285.	Imbalance Energy Calculation for tie points is contrary to WSCC and should be consistent with Section 2.5.27 of the ISO Tariff. BPA Amend. 4.	No longer an issue requiring further action in this proceeding
286.	Entities with Existing Contracts should not be required to sign a new Existing Operating Agreement, as required by Section 2.2.7.6, as a condition of receiving service under an Existing Contract. Protection of section limited to and discriminates against entities which did not enter into an Existing Operating Agreement prior to the ISO Operations Date. Same objections to definition of Existing Operating Agreement. Comments and Protest of the Transmission Agency of Northern California to the November 21, 1997 and November 26, 1997 Section 205 Tariff Amendments, Revised Staging Plan No. 1 and Motions for Waiver of the California Independent System Operator Corporation, Docket Nos. EC96-19-010, filed December 4, 1997 ("TANC 12/4 Comments") at 20-21 and Appendix A at 2.	No longer an issue requiring further action in this proceeding. ISO to remove EOA provisions
287.	Scheduling Coordinators may not be able to obtain Operating Reserves immediately upon undertaking to provide Scheduling Coordinator services as required by Section 2.5.20.2. TANC I Appendix B at 1.	No longer an issue requiring further action in this proceeding.
289.	Each ISO Protocol contains an introductory provision that states that "unless the context requires" any "inconsistency between the Protocol and the ISO Tariff is to be resolved in favor of the ISO Tariff. Referenced provision in each Protocol should be revised in accordance with December 17 Order. TANC I, Appendix A at 1, 4, 6, 8, 9, 10, 13, 14 and 15.	No longer an issue requiring further action in this proceeding (see 288)
290.	The ISO's proposed penalties and sanctions cannot be evaluated until they have been provided to the Commission and interested parties for review. TANC I, Appendix A at 6, 7, 8, 14 and 15.	No longer an issue requiring further action in this proceeding
291.		Merge with 134
292.		Merge with 107
297.	EPMI seeks clarification that the Commission's grant of market-based rate authority does not apply to the Companies' adjustment bids and supplemental energy bids. Request of Enron Power Marketing for Clarification Docket Nos. EC96-19-001, et al. filed 12/1/97 ("Enron IV") at 3.	No longer an issue requiring further action in this proceeding
301.		Merge with 251
311.	Scheduling Protocol §7.1.2: Since the exercise of Existing Rights and Non-Converted Rights is not subject to the Schedules and Bids Protocol or the Scheduling Protocol, the following should be appended to the last sentence of this section: "...; provided, that nothing contained in an ISO Protocol or an ISO agreement shall limit or restrict the exercise of Existing Rights or Non-Converted Rights unless such restriction or limitation is agreed to by the holders of such rights." Southern Cities.	No longer an issue requiring further action in this proceeding
312.		Merge with 313
313.	Scheduling Protocol §7.2.2: In the third, sixth and seventh lines, the phrase ",except as may be limited by the operation of SP 7.4," is inconsistent with the Commission's October 30, 1997 Order and should be deleted. Southern Cities Scheduling Protocol §7.2.1: In the eighth line, the phrase ", except as provided in SP 7.4," is inconsistent with the Commission's October 30, 1997 Order and should be deleted. Southern Cities	No longer an issue requiring further action in this proceeding
314.	Definition section in each ISO Protocol should be revised to delete phrase "Unless the context requires" in conformance with the December 17 Order respecting various ISO pro forma agreements. Metropolitan	No longer an issue requiring further action in this proceeding (see 288)

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315.	Each ISO Protocol contains an introductory provision that states that “unless the context requires” any “inconsistency between the Protocol and the ISO Tariff is to be resolved in favor of the ISO Tariff. Referenced provision in each Protocol should be revised in accordance with December 17 Order. Metropolitan	No longer an issue requiring further action in this proceeding (see 288)
320.	Section 8.3 of the ISO Tariff fails to create a defined term for “monthly metered consumption” and does not otherwise reflect the settlement among the parties in Docket No. ER98-211-000, et al. Metropolitan	No longer an issue requiring further action in this proceeding (see 176)
322.	Changes are necessary to Sections 2.5.3.2 and 2.5.20.1 of the ISO Tariff to provide further clarification concerning Operating Reserves for firm purchases outside the ISO Control Area. Comments and Protest to the November 21, 1997 and November 26, 1997 Tariff Amendments, Revised Staging Plan No. 1, and Motion for Waiver of the California Independent System Operator Corporation and the California Power Exchange Corporation of The Metropolitan Water District of Southern California, Docket Nos. EC96-19-010, et al., filed December 4, 1997 (“Metropolitan’s 12/4 Comments”) Appendix A at 1.	No longer an issue requiring further action in this proceeding
324.		Merge with 26
327.	The DFP should include a more fully developed discussion of the specific data and methods the ISO will use for Demand forecasting. Metropolitan I, Appendix A at 5.	No longer an issue requiring further action in this proceeding
328.	DFP 4.2 does not, but should, explain how the ISO will reconcile large differences between the Consolidated SC forecast and the Independent ISO Forecast. Metropolitan I, Appendix A at 6.	No longer an issue requiring resolution in this proceeding
329.	There is no framework or foundation provided in the DP regarding the relationship of various components or aspects of the ISO’s reliability system. Metropolitan I, Appendix A at 10.	No longer an issue requiring further action in this proceeding
331.	DP 3.6.1 is overly broad in that the ISO should be concerned only with transmission assets and Entitlements under the ISO’s Operational Control in accordance with the TCA, as not all PTO transmission assets are owned or controlled by the PTO. Metropolitan I, Appendix A at 11.	No longer an issue requiring further action in this proceeding
332.	In addition to the variables listed in DP 3.8.3, Control Areas need to exchange Scheduling Point Data. Metropolitan I, Appendix A at 11.	No longer an issue requiring further Commission action in this proceeding
333.	DP 3.9.1 inconsistently applies the communications requirements with the ISO, as Existing Operating Entities may or may not be Scheduling Coordinators, and Scheduling Coordinators are the primary contact with the ISO. Metropolitan I, Appendix A at 12.	No longer an issue requiring further action in this proceeding
335.		Merge with 617
336.	The provisions of DP 10.2.7 for setting priorities to shed and restore Load in consultation with Participants, should not preclude the ISO from using a different schedule, if necessary. Metropolitan I, Appendix A at 13.	No longer an issue requiring further action in this proceeding
337.	MP 3.1.8 sets forth the grounds for the ISO’s revocation of a Certificate of Compliance for a particular meter, but should be expanded to include a discussion of the consequences of such revocation. Metropolitan I, Appendix A at 23.	No longer an issue requiring further action in this proceeding
338.	The general guidelines for exemptions from metering requirements referenced in MP 13.2(a) should be published as soon as possible for comments. Metropolitan I, Appendix A at 23.	No longer an issue requiring further action in this proceeding (see 143)
339.	OCP 2.2.1 and 3.2.1, which establish the information required to be submitted to the ISO, does not include the requirements established in OCP 7.1. Metropolitan I, Appendix A at 2.	No longer an issue requiring further action in this proceeding
340.	OCP 3.2.2 should be expanded to include a discussion regarding the ISO’s Outage Coordination Office’s ability to request a Maintenance Outage, or to request a change in an Approved Maintenance Outage pursuant to Section 2.3.3.6 of the ISO Tariff. Metropolitan I, Appendix A at 3.	No longer an issue requiring further Commission action in this proceeding
341.	OCP 4.3.4, 4.4.5 and 5.5 must be revised to allow a Generator or Participating TO to change the Outage once the Outage has begun since it is common that Outages do not go as planned. Metropolitan I, Appendix A at 3.	No longer an issue requiring further Commission action in this proceeding

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344.	SBP 2.1.4's assignment of Usage Charges between Scheduling Coordinators in an Inter-Scheduling Coordinator Trade is unclear. The ISO should confirm the assignment of Usage Charges and provide a rationale for this allocation formula. Metropolitan I, Appendix A at 16.	No longer an issue requiring further action in this proceeding
345.	The rating agency certification in SCAP, App. A, 3.1 and 3.2 is unclear, and needs the certification requirements clarified. Metropolitan I, Appendix A at 15.	No longer an issue requiring further action in this proceeding
348.		Merge with 656
349.		Merge with 317
350.	Tariff Amendment No. 7 Amendment 7's restrictions on adjustment bids from dispatchable load should be permitted only for the minimum period necessary to make software corrections. Docket Nos. EC96-19-023, Protest of DWR to Amendment 7, p. 6, filed May 1, 1998 The temporary rule limiting adjustment bids applicable to dispatchable loads and exports is discriminatory. No explanation was provided for the requirement of "preferred MW operating point specified for the Dispatchable Load or export." Metropolitan Amendment No. 7 Rehearing Request at 23-25.	No longer an issue requiring further action in this proceeding
352.		Merge with 319
354.		Merge with 32
355.	ISO penalty mechanisms should be clear, fair and effective. EC96-19. et al, Comments of DWR filed 6/6/97 at 64.	No longer an issue requiring further action in this proceeding
359.	Clarification is required that operation as a metered subsystem is only required for the literal (physical) self provision of AGC. EC96-19, et al., Comments of DWR, p. 33, filed 9/2/97.	No longer an issue requiring further action in this proceeding
360.		Merge with 547
363.		Merge with 535
364.		Merge with 507
365.		Merge with 537
367.	Tariff Amendment No. 3: FERC should reject a priority for PG&E on Path 15 (specifically including PG&E's Operating Instructions) as among other things: (1) an impermissible collateral attack on FERC's ruling that the ISO's proposed Overgeneration Protocols are unduly discriminatory; (2) violative of the basic principle of comparability, which prohibits favoritism toward transmission providers' own generation and requirements of independence for <i>Independent</i> System Operators; (3) inconsistent with the ISO's responsibility to honor Existing Contracts; and (4) completely unfounded in fact regarding restructuring "bargains." EC96-19-016, et al., Protest of DWR filed 3/12/98.	No longer an issue requiring further Commission action in this docket
368.	Transmission Control Agreement: PG&E's Encumbrances (specifically granting PG&E a super transmission priority) should be rejected as among other things (1) an impermissible collateral attack on FERC's ruling that the ISO's proposed Overgeneration Protocols are unduly discriminatory; (2) violative of the basic principle of comparability, which prohibits favoritism toward transmission providers' own generation and requirements of independence for <i>Independent</i> System Operators; (3) inconsistent with the ISO's responsibility to honor Existing Contracts; and (4) completely unfounded in fact. Docket No. ER98-1971, Protest of DWR, filed 3/12/98; Docket No. ER98-1971-001, Protest of DWR, filed 8/5/98.	No longer an issue requiring further Commission action in this docket
369.		Merge with 220
370.		Merge with 220

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372.	Operating Reserves and Interruptible Imports. The ISO has proposed new language that requires a Scheduling Coordinator to self provide the Operating Reserves to cover Interruptible Imports. The ISO has not justified this modification. Scheduling Coordinators should still be able to purchase these reserves from the ISO. LADWP Comments in EC96-19-029 and ER96-1663-030.	No longer an issue requiring further action in this proceeding
373.		Merge with 12
377.		Merge with 2
380.	TCA - Section 21.2. - Lease or Rental of Equipment by the ISO. This section should be modified to make clear that the Participating TO is not required to rent or lease its equipment to the ISO. If the ISO requests the Participating TO to rent or lease its equipment, and the Participating TO agrees, then the parties must mutually agree upon the terms and conditions. LADWP Comments in Docket No. ER98-1971-001.	No longer an issue requiring further action in this proceeding
381.	TCA: Section 26.11(2) - Amendment. Section 26.11 provides, in relevant part: "This Agreement may be modified . . . through the ISO ADR Procedure set forth in Section 13 of the ISO Tariff" This section would allow the Agreement to be <u>modified</u> (as opposed to be <u>interpreted</u>) via ADR procedures. Without some criteria clearly defining in what manner an arbitration decision could actually change or modify the Agreement, this provision is overly broad and a recipe for unintended consequences. The Agreement should be modified only where the Parties mutually agree, subject to Commission approval, or by order of the Commission to ensure conformity with the Federal Power Act. The language allowing for modification of the agreement via ADR procedures should be deleted. LADWP Comments in Docket No. ER98-1971-001.	No longer an issue requiring further action in this proceeding
382.	Existing Contract Rights On Path. 15 Must Be Protected. Los Angeles supports the fundamental principal that all Existing Contracts must be honored by the ISO, and the ISO's operations must be consistent with the terms of Existing Contracts, particularly with respect to Path. 15. The ISO should be required to file a report confirming and detailing the resolution of the Path. 15 issues, and all parties should be afforded an opportunity to file comments on the report that address, among other matters, whether the proposed resolution of Path. 15 issues preserves the rights of parties under Existing Contracts. LADWP 9/3/98 Answer in ER98-1971-001.	No longer an issue requiring further Commission action in this proceeding
384.	TOs should not be assessed Usage Charges that result from a reduction in capacity between the day-ahead and hour-ahead markets. The following sections should be amended: ISO Tariff § 7.3.1.7; Settlements and Billing Protocol, Appendix E, § 2.3.3. This a very important issue for Edison because the magnitude of the usage charges offsets most of the congestion revenues that Edison earn. Thus, the provision also increases transmission rates for customers. Edison' August 5, 1998 Protest to the ISO's Compliance Filing at 3-6. (ER96-1663-030; EC96-19-029).	No longer an issue requiring further action in this proceeding
385.	Edison: Changes are needed to the ISO Tariff to permit multiple Scheduling Coordinators to schedule at one meter. FERC's October 30 Order required the ISO to provide for this. While the ISO removed the prohibition on Eligible Customers being represented by more than one SC, Section 2.3 of the SCAP still states: "only one SC may register with the ISO for the meter or Meter Point in Question." The ISO systems still cannot handle multiple SC's per meter, thus this issue is unresolved. The ISO Staff has stated that Eligible Customers can be represented by more than one SC simply by installing separate meters, but this proposal does not resolve the primary issue for those resources having ISO meters which are directly polled by the ISO MDAS. Edison's August 5, 1998 Protest to the ISO's Compliance Filing at 6-8. (ER96-1663-030; EC96-19-029).	No longer an issue requiring further action in this proceeding
386.	The ISO failed to comply with FERC's order to permit all authorized users access to ISO MDAS settlement-ready meter data. FERC's October 30 Order required ISO to provide this functionality. In its 9/3/98 Answer, the ISO implies it is working on this issue and protests filed by intervenors are "premature". If the ISO is working on software modifications to resolve this issue then it should be included in the ISO's Staging Plan with a "Target Release Date." If the ISO is not working on a fix at this time, it should be required to do so. Edison's August 5, 1998 Protest to the ISO's Compliance Filing at 8-9. (ER96-1663-030; EC96-19-029).	No longer an issue requiring further action in this proceeding.
387.		Merge with 226
389.	The ISO has refused to certify as A/S providers generating units without ISO EMS telemetry despite the fact that the ISO Tariff does not require EMS telemetry equipment for Spin, Non-Spin, and Replacement Reserves. ISO Staff is requiring ISO EMS telemetry for all resources providing Ancillary Services. The ISO Tariff only requires EMS telemetry for those resources providing Regulation service. The ISO's policy is not only contrary to the ISO Tariff, it will prevent load resources and QFs (once they terminate their contract with their IOU) from providing Ancillary Services. If the ISO intends to require EMS telemetry for all Ancillary Service providers, it must revise its tariff and protocols and receive FERC approval prior to doing so and should stop enforcing the current policy. Edison - Operational experience.	No longer an issue requiring further Commission action in this proceeding

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394.	The ISO's continued use of a "weighting factor" in the formula for real-time intra-zonal congestion management, as set forth in Tariff section 7.2.1.5, without explanation or justification. TURN/UCAN 8/5/98 protest in EC96-19-029 and ER96-1663-030 at 10-12.	No longer an issue requiring further action in this proceeding
395.		Merge with 461
396.	ISO provision of a bulletin board for voluntary publication of Adjustment Bids pursuant to Tariff Section 7.2.4.1.5, for use by Schedule Coordinators during the Day-Ahead congestion management process. TURN/UCAN 8/5/98 protest at 15-16.	No longer an issue requiring resolution in this proceeding
406.	Section 2.2.7.6 - Status permissible market deviations - see MSS. PG&E.	No longer an issue requiring further action in this proceeding. ISO to remove EOA provisions
407.	Section 2.2.7.2 - Provide opportunity to correct errors in a reasonable time. PG&E 8/5/ at 11.	No longer an issue requiring further action in this proceeding
408.		Merge with 224
410.	Section 2.3.2.3.2 - Says ISO will load shed prior to market intervention. PG&E 8/5 at 12.	No longer an issue requiring further action in this proceeding
414.	Section 2.5.4 - ISO Tariff should explain locational procurement of AS. PG&E 8/5 at 14. Amendment to Section 2.5.7.2 of the Tariff provides that where there is interzonal congestion, the ISO will purchase Ancillary Services in each zone separately. There is no explanation of why this will be done. NCPA II at 8.	No longer an issue requiring further action in this proceeding
415.		Merge with 2
419.	Section 2.5 - ISO should explain procurement of A/S from RMR. Explain selection process. Explain the settlement process. PG&E 8/5 at 18.	No longer an issue requiring further action in this proceeding (subject to additional clarifications from the ISO)
421.	Section 7.3.1.7 - Modify tariff to remove TO charges for reduced capacity. As PG&E noted in its 8/5 comments on the ISO tariff Amendment 4 is not compatible with market design agreed by stakeholders. Edison also commented on this issue. While the ISO is working to remove TO debits for reduced capacity between day ahead and hour, this issue has created about \$2-3 million in charges to PG&E and has not yet been resolved. PG&E 8/5 at 20.	No longer an issue requiring further action in this proceeding
422.	Section 10.6.2.3 - In the October 30 Order, 81 FERC at 61,516, the Commission directed PG&E to re-raise the request to delete this section if it determined definitively that the ISO has no ability to use these data for settlement or other purposes. PG&E.	No longer an issue requiring further action in this proceeding
425.		Merge with 54
427.	Section 11.4.3; 11.7.2 - The ISO does not provide sufficient supporting documentation on settlements to allow SC verification. PGE PX comm 8/3 at 3-5.	No longer an issue requiring further Commission action in this proceeding
431.	Intra-Zonal Congestion Management procedures and protocols remain incomplete, unspecified or not filed. Any Operating Procedures currently in use by the ISO affecting rates and charges incurred by Market Participants must be filed with the Commission. TANC, Docket Nos. EC96-19-029, et al., at 10-12, filed August 5, 1998 ("TANC 8/5 Comments").	No longer an issue requiring further action in this proceeding (see 535)
432.	The ISO did not comply with the Commission's directive to make public the algorithm that it uses to manage Inter-Zonal Congestion. TANC 8/5 Comments at 12-13.	No longer an issue requiring further action in this proceeding (see 537)

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433.	The ISO did not comply with the Commission's directive to charge Scheduling Coordinators for Ancillary Services based upon real-time changes in Demand. The Commission should establish a time frame for the ISO to explain the technical problems it cited associated with complying with this directive and to develop and file the necessary tariff changes to achieve compliance. TANC 8/5 Comments at 14-15.	No longer an issue requiring further action in this proceeding
434.	The ISO has failed to fully comply with the Commission's directive to charge Scheduling Coordinators importing interruptible Energy with associated Ancillary Services, as the tariff is silent as to whether the SC has any obligation to obtain Regulation or Replacement Reserve. TANC 8/5 Comments at 16.	No longer an issue requiring further action in this proceeding
435.		Merge with 502
439.	The ISO has filed to make provision for dispatching Ancillary Services by telephone or fax. TANC 8/5 Comments at 20-21.	No longer an issue requiring further action in this proceeding (see 541)
441.	The change in Section 2.2.3.3 of the ISO Tariff may give the ISO too much control over deciding the creditworthiness of a Scheduling Coordinator due to a delay in making a payment due under the ISO Tariff. TANC 8/5 Comments at 29.	No longer an issue requiring further action in this proceeding
445.	Section 2.3.3.1 of the ISO Tariff needs clarifying language to delineate the scope of the ISO's control and authority. TANC 8/5 Comments at 30.	No longer an issue requiring further action in this proceeding
447.	The new language added to the end of Section 3.2.3 of the ISO Tariff appears to conflict with the first sentence. TANC 8/5 Comments at 31.	No longer an issue requiring further Commission action in this proceeding
449.	Section 7.3 of the ASRP is intended to supplement Section 2.5.3.4 of the ISO Tariff, but its terms vary significantly from those of Section 2.5.3.4. TANC 8/5 Comments at 49-50.	No longer an issue requiring further action in this proceeding
450.	The Demand Forecasting Protocol definitions and requirements fail to include sufficient detail or instructions to ensure consistency form the Scheduling Coordinators and UDCs. TANC 8/5 Comments at 50-51.	No longer an issue requiring further action in this proceeding
451.	DP 2.1.3 does not properly provide for the addition of Local Reliability Criteria for new Participating TOs. TANC 8/5 Comments at 51-52.	No longer an issue requiring further action in this proceeding (see 330)
453.	Absent an emergency, the authority provided to the ISO in DP 9.1.1 would violate the terms of an Existing Contract. Tanc 8/5 Comments at 53-54.	No longer an issue requiring further action in this proceeding (see 335)
457.		Merge with 456
458.	OCP 4.3.7, 4.4.8 and 5.3.3 should recognize and accommodate the need for priority for Outages on a basis other than planned maintenance schedules. TANC 8/5 Comments at 57.	No longer an issue requiring further action in this proceeding
460.	ISO Tariff §2.5.22.8: This section should be modified to make clear that the ISO's redispatch authority as referenced in this section applies to generating resources only. If the ISO intends to redispatch, <i>i.e.</i> , curtail, loads that are not reflected in a decremental bid for the purpose of relieving Intra-Zonal Congestion, it should clearly specify the circumstances under which such curtailments will occur and set forth the procedures that will be followed. Comments of Anaheim, Azusa, Banning, Colton, and Riverside, California, Docket No. ER98-3760-000, August 17, 1998, at page 6.	No longer an issue requiring further action in this proceeding
463.	ISO Tariff §§7.2.4.2.1 and 7.2.4.2.3: "Operating point" should be a defined term. Anaheim, Azusa, Banning, Colton, and Riverside Docket No. ER98-3760-000, August 17, 1998, at page 8.	No longer an issue requiring further action in this proceeding
467.	ISO Tariff § 13.3.1.2: This section should be modified to make clear that the list from which arbitrators will be selected will be the AAA list if the ISO is a party to the dispute. Anaheim, Azusa, Banning, Colton, and Riverside Docket No. ER98-3760-000, August 17, 1998, at page 8.	No longer an issue requiring further action in this proceeding
469.	Master Definitions, definition of "PX (Power Exchange)": The ISO's June 1, 1998 Compliance Filing deleted language from the definition of the term "PX" that referred to the PX Hour Ahead market. In light of the PX's recent initiation of procedures for Hour Ahead transactions, the reference to the Hour Ahead market should be included in the PX definition. Anaheim, Azusa, Banning, Colton, and Riverside Docket No. ER98-3760-000, August 17, 1998, at page 9.	No longer an issue requiring further action in this proceeding

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471.		Merge with 446
474.	ISO Tariff §2.2.11.3: References to inter-SC trades involving Ancillary Services deleted by the ISO's June 1, 1998 filing should be reinstated. Comments of Southern Cities on the June 1, 1998 Compliance Filing, Dockets Nos. EC96-19-029 and ER96-1663-030, August 5, 1998, at page 6.	No longer an issue requiring further action in this proceeding
475.		Merge with 319
476.		Merge with 251
478.	ISO Tariff §2.5.20.1: Unexplained changes proposed in the ISO's June 1, 1998 Compliance Filing should be explained and justified. Comments of Southern Cities on the June 1, 1998 Compliance Filing, Dockets Nos. EC96-19-029 and ER96-1663-030, August 5, 1998, at page 8.	No longer an issue requiring further action in this proceeding
479.	ISO Tariff §5.2.7: Unexplained changes proposed in the ISO's June 1, 1998 Compliance Filing should be explained and justified. Comments of Southern Cities on the June 1, 1998 Compliance Filing, Dockets Nos. EC96-19-029 and ER96-1663-030, August 5, 1998, at page 9.	No longer an issue requiring further action in this proceeding
480.	ISO Tariff §6.1.2.2.1: Unexplained changes proposed in the ISO's June 1, 1998 Compliance Filing should be explained and justified. Comments of Southern Cities on the June 1, 1998 Compliance Filing, Dockets Nos. EC96-19-029 and ER96-1663-030, August 5, 1998, at page 9.	No longer an issue requiring further action in this proceeding
483.	ISO Tariff §7.2.2.5: Unexplained changes proposed in the ISO's June 1, 1998 Compliance Filing should be explained and justified. Comments of Southern Cities on the June 1, 1998 Compliance Filing, Dockets Nos. EC96-19-029 and ER96-1663-030, August 5, 1998, at page 9.	No longer an issue requiring further action in this proceeding
484.	ISO Tariff §7.2.5.2.4: Unexplained changes proposed in the ISO's June 1, 1998 Compliance Filing should be explained and justified. Comments of Southern Cities on the June 1, 1998 Compliance Filing, Dockets Nos. EC96-19-029 and ER96-1663-030, August 5, 1998, at page 9.	No longer an issue requiring further action in this proceeding
485.	ISO Tariff §7.3.2: Unexplained changes proposed in the ISO's June 1, 1998 Compliance Filing should be explained and justified. Comments of Southern Cities on the June 1, 1998 Compliance Filing, Dockets Nos. EC96-19-029 and ER96-1663-030, August 5, 1998, at page 9.	No longer an issue requiring further action in this proceeding
486.	ISO Tariff §11.4.3: Unexplained changes proposed in the ISO's June 1, 1998 Compliance Filing should be explained and justified. Comments of Southern Cities on the June 1, 1998 Compliance Filing, Dockets Nos. EC96-19-029 and ER96-1663-030, August 5, 1998, at page 9.	No longer an issue requiring further action in this proceeding
487.	Scheduling Protocol §3: This section gives the ISO authority "in extreme circumstances ... to abort the Hour-Ahead Schedule and operate in real time." Market participants are entitled to a more detailed explanation of the types of extreme circumstances that might lead the ISO to abort the Hour-Ahead Schedules, the procedures that the ISO would expect to follow in such circumstances, and the bases for setting prices for transactions occurring under such circumstances. Comments of Anaheim, Azusa, Banning, Colton, and Riverside, California, Docket No. ER98-3760-000, August 17, 1998, at page 20.	No longer an issue requiring further action in this proceeding
495.		Merge with 537
496.		Merge with 73
498.		Merge with 535
499.		Merge with 537
500.	The ISO did not comply with the Commission's directive to charge Scheduling Coordinators for Ancillary Services based upon real-time changes in Demand. The Commission should establish a time frame for the ISO to explain the technical problems it cited associated with complying with this directive and to develop and file the necessary tariff changes to achieve compliance. Metropolitan's 8/5 Comments at 12.	No longer an issue requiring further action in this proceeding
501.	The ISO has failed to fully comply with the Commission's directive to charge Scheduling Coordinators importing interruptible Energy with associated Ancillary Services, and the ISO should resolve whether the SC has any obligation to obtain Regulation or Replacement Reserve for interruptible energy import. Metropolitan's 8/5 Comments at 13.	No longer an issue requiring further action in this proceeding
502.	The Compliance Filing provides for price caps by not pro forma bid caps as required by the October 30 Order. Metropolitan's 8/5 Comments at 13-14. The Compliance Filing provides for price caps by not pro forma bid caps as required by the October 30 Order. TANC 8/5 Comments at 16-17.	No longer an issue requiring further action in this proceeding

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503.		Merge with 436
506.	Zonal Market Clearing Price should be used to establish the price of certain Ancillary Services eligible to be sold back to the ISO rather than an undefined “hourly user rate.” Metropolitan’s 8/5 Comments at 22-23.	No longer an issue requiring further Commission action in this proceeding
509.	Each ISO Protocol allows for the ISO Governing Board to review and approve proposed changes to the Protocols. These sections should be revised to provide for filing of all Protocol changes with the Commission for review and approval of any amendment prior to implementation. Metropolitan’s 8/5 Comments at 64.	No longer an issue requiring further action in this proceeding (see 316)
510.		Merge with 442
514.	The term “ISO’s estimated average cost” for Imbalance Energy, Ancillary Service and Usage Charges in Section 2.2.7.3 should be clarified to specify how this estimate is calculated. Metropolitan’s 8/5 Comments, Appendix I at 3.	No longer an issue requiring further action in this proceeding
518.	Section 2.3.2.6 of the ISO Tariff should provide for posting of the prioritized Load shedding and restoration schedule on the ISO Web Site. Metropolitan’s 8/5 Comments, Appendix I at 3.	No longer an issue requiring further action in this proceeding (PTO to provide load shedding plan)
520.	The heading of Section 2.5.7.1 is a defined term which has been deleted from the ISO Tariff, therefore, the section should be renamed. Metropolitan’s 8/5 Comments, Appendix I at 4.	No longer an issue requiring further action in this proceeding
522.	The first sentence of the third paragraph of Section 2.5.20.3 of the ISO Tariff is essentially a repeat of the first sentence of the second paragraph. Also, the last sentence of the third paragraph is essentially a repeat of the first sentence of the first paragraph. Metropolitan’s 8/5 Comments, Appendix I at 5.	No longer an issue requiring further action in this proceeding
523.	The use of the phrase “the ISO considers” in Section 5.6.1 of the ISO Tariff presents the perception that the ISO uses subjective opinion in defining System Emergency. Metropolitan’s 8/5 Comments, Appendix I at 5.	No longer an issue requiring further action in this proceeding
526.	The term “ISO Operating Agreement” in ISO Appendix B, Section 1.B, is not a defined term. Metropolitan’s 8/5 Comments, Appendix I at 6.	No longer an issue requiring further action in this proceeding
531.	The ISO’s revision to the definition of Grid Operations Charge confuses how this charge is calculated and appears to confuse the distinction between Inter- and Intra-Zonal charges. Metropolitan’s 8/17 Comments at 14-15.	No longer an issue requiring further action in this proceeding
533.	The term Balancing Energy in Section 2.5.22.5 of the ISO Tariff is not a defined term and should not be capitalized. Metropolitan’s 8/17 Comments at Appendix A.	No longer an issue requiring further action in this proceeding
538.	At page 61,482 of the October 30 Order, the Commission required the ISO to compute, for each Advisory and Final Schedule in the Day-Ahead and Hour-Ahead Markets, the Dispatch and Usage Charges that would have resulted if the ISO had been allowed to relieve Congestion without the restriction that Scheduling Coordinators keep their schedules balanced. The Commission noted that the calculation would inform Market Participants about potential trading opportunities. While the Commission’s Order did not specifically require that this obligation be embodied in the Compliance Tariff, this is precisely the type of obligation that should be specified in the ISO Tariff. Neither the Compliance Tariff nor the Compliance Matrix addresses this matter. Cities/M-S-R 8/5/98 at 7.	No longer an issue requiring further action in this proceeding
539.	At page 61,485 of the October 30 Order, the ISO was instructed to reflect in the Compliance Tariff the procedures for allocating transmission capacity on a pro-rata basis, particularly those related to maintaining balanced schedules, for each Scheduling Coordinator when the ISO reduces a Scheduling Coordinator’s Generation due to insufficient transmission capacity. In response, the ISO stated that it modified Section 10.2 of the Scheduling Protocol to comply with the Commission’s Order. The ISO’s response fails to comply with the October 30 Order. Cities/M-S-R 8/5/98 at 8.	No longer an issue requiring further action in this proceeding

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540.	<p>At page 61,494 of the October 30 Order, the Commission recognized that a Scheduling Coordinator would not be required to pay for additional Replacement Power and other Ancillary Services where the Loads and Generation, in real time, differ from the scheduled Loads and Generation, but while the Loads and Generation remain in balance. In such a case, the ISO must procure additional Replacement Power and other Ancillary Services. The Commission stated that the Scheduling Coordinator should pay the additional costs for Ancillary Services in such a situation, and ordered the ISO to modify the ISO Tariff to reflect that decision. Rather than make any modification to the ISO Tariff, the ISO stated this matter is “highly technical,” would be expensive to fix and is to be an item covered in Revised Staging Plan 4. Cities/M-S-R 8/5/98 at 9.</p>	No longer an issue requiring further action in this proceeding
542.	<p>At page 61,505 of the October 30 Order, the Commission required the ISO to modify Section 7.1.3 regarding the Self-Sufficiency Test to clarify that existing transmission service contracts can satisfy the Self-Sufficiency Test while such contracts are in existence. The ISO modified Section 7.1.3.1 in an attempt to comply with the October 30 Order. However, the ISO’s proposed fix does not properly implement the October 30 Order. Cities/M-S-R 8/5/98 at 11.</p>	No longer an issue requiring further action in this proceeding
543.	<p>At page 61,509 of the October 30 Order, the Commission stated that Eligible Customers should be able to be represented by more than one Scheduling Coordinator. However, the Commission recognized the ISO had not, at that time, developed the software necessary to accommodate the use of more than one Scheduling Coordinator. The Commission required the ISO to keep the Commission apprised of the software development and to notify the Commission if the software would not be ready by the ISO Operations Date and, if not, to ask for any extensions of time needed. At the ISO Operations Date, and currently, no Eligible Customer is allowed to use more than one Scheduling Coordinator. The Compliance Tariff is silent on the matter and the issue does not appear on the ISO’s Compliance Matrix. Cities/M-S-R 8/5/98 at 11-12.</p>	No longer an issue requiring further action in this proceeding

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549.		Merge with 507
551.		Merge with 199
552.		Merge with 656
553.		Merge with 12
554.		Merge with 198
555.	The ISO Tariff Should Not Preclude DWR's System From Operating And Self-Providing Ancillary Services As A Metered Subsystem. EC96-19-029 & ER96-1663-030, Comments and Protest of DWR, p. 29-32 filed 08/05/1998.	No longer an issue requiring further action in this proceeding
556.	The ISO Tariff Should Not Make Participants' Rights To Become An MSS Contingent Upon An "Existing Operating Agreement" Signed Prior To ISO Start-Up. EC96-19-029 & ER96-1663-030, Comments and Protest of DWR, p. 33 filed 08/05/1998.	No longer an issue requiring further action in this proceeding. ISO to withdraw EOA provisions
557.		Merge with 356
561.	Proposed Tariff Changes Relating to RMR Settlements SDG&E believes the ISO's proposed changes to the Settlement and Billing Protocol, Appendix H, are not adequate to remedy the numerous defects which currently exist in the tariff provisions and protocols relating to settlement of RMR contract costs. The following changes need to be made retroactively to conform the tariff and protocols to what the ISO is actually doing, to correct errors in the equations, and to add missing provisions that would allow the ISO to recover RMR contract costs on a non-discriminatory basis. SDG&E	No longer an issue requiring further action in this proceeding
563	(b) Appendix H Section H 2.2 of the Settlement and Billing Protocol should be revised to read as follows: "Each Participating TO shall pay to the ISO the total amount payable by the ISO for local Reliability Must-Run services for each month under the Reliability Must-Run Contracts for the Reliability Must-Run Units located in the Participating TO's Service Area. The charge to Participating TO n for month m for Reliability Must-Run Unit u located in the Service Area of Participating TO n shall be calculated as follows: $RMR_{Cnmu} = RMR_{Paynmu}$ The total charge to each Participating TO for local Reliability Must Run services for a given month shall be calculated by summing all the local Reliability Must Run service charges for the month for the Reliability Must Run Units located in the Service Area of the Participating TO. The charge for Participating TO n for month m shall be calculated as follows $Total\ RMR_{Cnm} = \sum(RMR_{Cnmu})$ The total charge for all Participating TOs for local Reliability Must Run services for a given month is calculated by summing all the local Reliability Must Run service charges for all Participating TOs during month m. The total charge for all Participating TOs n for month m is calculated as follows: $Total\ RMR_{Cm} = \sum(RMR_{Cnm})$ ". SDG&E	No longer an issue requiring further action in this proceeding
564	The definition for RMR_{Paynmu} in Appendix H Section H 3.38 should be changed to read as follows: "The total amount payable by the ISO for local Reliability Must-Run services for month m under the Conditions of Must-Run Agreement applicable to Reliability Must-Run Unit u located in the Service Area of Participating TO n.". SDG&E	No longer an issue requiring further action in this proceeding
565	(d) Add a new section Appendix H Section H2.3: "Each Scheduling Coordinator shall pay to the ISO a share of the total amount payable by the ISO for grid-wide Reliability Must-Run services for each settlement period under the Reliability Must-Run Contracts for the Reliability Must-Run Units. This share shall be based on the ratio of each scheduling coordinator's metered load to all scheduling coordinators' metered load. The charge to Scheduling Coordinator j for Trading Interval t for Reliability Must-Run Unit u shall be calculated as follows: $RMR_{GWCjtu} = RMR_{GWPayu} * [L_{ajt} / \sum(L_{ajt})]$ The total charge to each Scheduling Coordinator for grid-wide Reliability Must Run services for Trading Interval t shall be calculated by summing each Scheduling Coordinator's share of grid-wide Reliability Must Run service charges across all Reliability Must Run Units u. The charge for Scheduling Coordinator j for Trading Interval t shall be calculated as follows: $Total\ RMR_{GWCjt} = \sum(RMR_{GWCjtu})$. The total charge for all Scheduling Coordinators for local Reliability Must Run services for a given month is calculated by summing all the grid-wide Reliability Must Run service charges for all Scheduling Coordinators across all Trading Intervals of month m. The total charge for all Scheduling Coordinators for month m is calculated as follows: $m\ Total\ RMR_{GWCm} = \sum[\sum(RMR_{GWCjt})]$ ". SDG&E	No longer an issue requiring further action in this proceeding
566.	(e) Add a definition for RMR_{GWPayu} in new Appendix H Section H 3.45 as follows: "The total amount payable by the ISO for grid-wide Reliability Must-Run services for Trading Interval t under the Conditions of Must-Run Agreement applicable to Reliability Must-Run Unit. SDG&E	No longer an issue requiring further action in this proceeding

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567.	(f) Add a definition for RMRGWCjtu in new Appendix H Section H 3.46 as follows: "The grid-wide Reliability Must-Run Charge payable by Scheduling Coordinator j for Trading Interval t for Reliability Must-Run Unit u." SDG&E	No longer an issue requiring further action in this proceeding
568	(g) The payment equation shown in Section H 2.1 should be revised as follows: $RMR\ Pay\ Auom = Sum[(Euot * RPRuot) + (EMuot * EMRuot) + (Euot * HVO \& Muot) + (SCACuot)] + HOFuom + SUFCuom + SUPCuom + OSUCuom + Sum[AGCuot + SRuot + NSRuot + RRuot + VSuot + ASPDPuot]$ THIS TERM IS NOT CURRENTLY USED] - Sum[SCASCPuot * RMR Anc.Ser.Cap.] - Sum[SCASEPuot * RMRGa/s] - Sum[ERuot * Pxuot] - Sum[(Euot-ERuot) * Pxuot] Note: Analogous changes need to be made to "RMR Pay Buom" and "RMR Pay Cuom". SDG&E	No longer an issue requiring further action in this proceeding
569.	(h) Add a new subsection to Appendix H Section H 2.1 (e) as follows: "RMR Total Paym = Sum(RMR Total Payom)" SDG&E	No longer an issue requiring further action in this proceeding
570.	(i) Add a definition for RMR Total Paym in new Appendix H Section H 3.47 as follows: "The total amount payable for month m from ISO to all Reliability Must-Run Owners for local and grid-wide Reliability Must-Run services from Reliability Must Run Units to which Conditions of Must-Run Agreements A, B or C apply." SDG&E	No longer an issue requiring further action in this proceeding
571.	(j) An important settlement check should be added as new Section H 2.4: "RMR Total Paym = Total RMRCm + TotaRMRGWCm" SDG&E	No longer an issue requiring further action in this proceeding
572.	(k) Section H 3.18 does not define the "price payable" to a Reliability Must-Run Unit Owner for ancillary service capacity used in a non-market transaction. In practice the ISO has been using the rate payable to the RMR Must-Run Unit Owner in accordance with Schedule E in the RMR agreements. Since the ISO has no explicit tariff basis for using this rate, Section H 3.18 must be changed retroactively to reflect the ISO's current practice. This is accomplished by adding the following sentence at the end of Section H.3.18: "The price payable is the contract capacity price defined in Schedule E of the RMR contract." SDG&E	No longer an issue requiring further action in this proceeding
573.	(l) Section H 3.19 does not define the "price payable" to a Reliability Must-Run Unit Owner for Energy delivered from ancillary service capacity used in a non-market transaction. In practice the ISO has been using the market-based hourly imbalance energy price. Since the ISO has no explicit tariff basis for using this rate, Section H 3.19 must be changed to reflect the ISO's current practice. This is accomplished by adding the following sentence at the end of Section H.3.19: "The price payable is equal to Pxuot." Proposed Tariff Changes Eliminating References to "Proxy Prices" for Self-Provided Ancillary Services. SDG&E	No longer an issue requiring further action in this proceeding
579.	Proposal to specifically reference Y2K Compliance in the ISO Tariff. SDG&E supports referencing Y2K compliance, however you have not detailed how or where the tariff would be modified. SDG&E would like to review the proposed wording. SDG&E .	No longer an issue requiring further action in this proceeding
582.	Section 2.2.10.8 is modified to eliminate aggregate forecasts for Reliability Must-Run (RMR) Generation by Zone. However, the ISO has not provided any explanation for this change. As an aggregate forecast of RMR is a valuable piece of information for the market, the ISO should be required to reinstate this language. ECI compliance filing protest at 8-9.	
584.	Section 2.2.12: The ISO proposes to enable itself to waive unilaterally the timing requirements of Section 2.2 of its Tariff, which relates to Scheduling in general. This provision should be rejected for a several reasons. The effect of this provision is to give the ISO unfettered discretion to vary its timelines at its whim. The fact that the ISO is unable to meet its own timing requirements, thus causing a "delay," by no means justifies the ISO's ability to re-write the rules, and more importantly, provides little incentive for the ISO to meet its own timing requirements. The ISO should be permitted to deviate from its scheduling timelines only under defined reliability emergencies. Finally, variable timelines do not contribute to fluid markets; instead, by setting up ill-defined parameters and removing predictability, they hinder market participants' ability to plan ahead. ECI compliance filing protest at 3.	No longer an issue requiring further Commission action in this proceeding
588.	Sections 2.5.11 and 2.5.22.4.2(f): In addition to the specific items required for bids, these sections provide that the ISO may require "other information as the ISO may determine it requires to evaluate bids as published from time to time in ISO Protocols." Such a broad provision puts too much discretion in the hands of the ISO. In order to protect the market from market manipulation by the ISO and ensure due process, the Commission should limit any additional bid information requirements to those filed and accepted by the Commission. ECI compliance filing protest at 10.	No longer an issue requiring further action in this proceeding

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589.	Section 2.5.22.5: It is unclear from this section (and others, <i>e.g.</i> , Section 4.0 of the Schedules and Bids Protocol) whether the ISO intends to carry forward Adjustment Bids submitted in the Day-Ahead Market to use in the Real Time Market. As Adjustment Bids submitted in the Day-Ahead Market are based on the operating criteria and market assumptions at the time the bid is submitted, it would be inappropriate to use such Adjustment Bids in the Real Time Market. ECI compliance filing protest at 10.	No longer an issue requiring further action in this proceeding
592.	Section 7.2.5.1: This section also addresses Inter-Zonal Congestion management. As with Section 7.2.1.1, the ISO has modified this section, without explanation, to exclude transmission associated with Ancillary Services. As with Section 7.2.1.1, the transmission associated with Ancillary Services should be used in determining congestion. To do otherwise will distort the congestion market. ECI compliance filing protest at 11-12.	No longer an issue requiring further action in this proceeding (see 591)
596.	Section 7.4.1 is modified to eliminate language that permits Scheduling Coordinators to self provide losses. In order to ensure that Scheduling Coordinators are able to self provide losses, the ISO should be required to reinstate this Tariff language. ECI compliance filing protest at 13.	No longer an issue requiring further action in this proceeding
609.		Merge with 597
610.	DP 7.4 adjusts Day-Ahead Final Schedules to accommodate Intra-Zonal Congestion. The ISO should be prohibited from adjusting Final Schedules. Market participants need to be confident of their final schedules at some predetermined point. Any congestion management on the part of the ISO should take place between the initial preferred schedule and the revised preferred schedules, such that all congestion management has taken place prior to the issuance of Final Schedules. ECI compliance filing protest at 21.	No longer an issue requiring further action in this proceeding
612.		Merge with 590
613.	DP 8.5 appears to be inconsistent with the terms of Existing Contracts. Consistent with the rights under such contracts, the ISO should modify this section to provide that the ISO may adjust Existing Contracts only to the extent permitted under such contracts. Additionally, as discussed in ECI's comments on DP 8.1.1, the ISO should not be permitted to make adjustments after Final Schedules have been issued. ECI compliance filing protest at 22.	No longer an issue requiring further action in this proceeding
614.		Merge with 597
616.	DP 8.7.3 (d) appears to be inconsistent with Section 5.1.4.1 (h) of the Schedules and Bids Protocol, which requires 60-minutes notification for the dispatch of Replacement Reserve, while BEEP is dispatched on 10 minutes notification. The ISO should clarify this provision to comply with the Schedules and Bids Protocol for Replacement Reserve. ECI compliance filing protest at 24.	No longer an issue requiring further action in this proceeding
623.		Merge with 54
624.		Merge with 12
626.		Merge with 251
630.		Merge with 590
631.	The ISO should observe the market, not police it. Market tampering should not be permitted. The ISO's role in market monitoring should be limited to data collection and monitoring only. Specific corrective actions should be limited to identifying specific areas where changes to the rules and tariffs are needed and making recommendations to the market participants with respect to proposed changes. Any fines or service suspensions should be left to FERC. ECI compliance filing protest at 30-34.	No longer an issue requiring further action in this proceeding
632.		Merge with 66
633.		Merge with 64
636.		Merge with 276
638.		Merge with 366

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640.		Merge with 656
647.		Merge with 668
648.	There is no warrant in law or contract for according Must-Run Generation priority higher than or equal to the priority of others under Existing Contracts. TANC Rehearing.	No longer an issue requiring further action in this proceeding (See issue 656)
649.		Merge with 12
650.	FERC should require the ISO to provide Market Participants the ability to trade through more than one Scheduling Coordinator. ECI Rehearing.	No longer an issue requiring further action in this proceeding
651.		Merge with 294
652.	Market Participants should be required, at a minimum, to designate different people to serve on the Boards of the ISO and PX. ECI Rehearing	No longer an issue requiring further action in this proceeding
659.		Merge with 12
660.		Merge with 350
663.		Merge with 643
666.		Merge with 644
669.		Merge with 653
670.		Merge with 656
671.	<p>The ISO's rules currently permit customers to take service from multiple SCs. The ISO amended § 2.1.1 of the Tariff to comply with this directive in the 7/15/98 Clarification filing.</p> <p>The outstanding issue is whether to possibly permit multiple SCs per a single meter. The ISO's software does not provide for this function, and it may be impossibly complex to track all possible market arrangements and allocation schemes for multiple SCs at a single meter. ISO Request for Reh'g, etc. dated 12/1/97 in Docket Nos. EC96-19 and ER96-1663 at pp. 3-5.</p>	No longer an issue requiring further action in this proceeding
672.	Although bidders may submit Adjustment Bids and Supplemental Energy bids for the same resource, Adjustment Bids are not converted into Supplemental Energy bids because they serve two distinct purposes - Congestion Management ("CM") and Imbalance Energy, respectively. Adjustment Bids left standing at the end of the CM process for Day-Ahead and Hour-Ahead scheduling are treated as standing offers to be used for real-time CM. Supplemental Energy bids are one of the tools by which the ISO manages imbalances in real-time. ISO Request for Reh'g, etc. dated 12/1/97 in Docket Nos. EC96-19 and ER96-1663 at pp. 5-6.	No longer an issue requiring further action in this proceeding