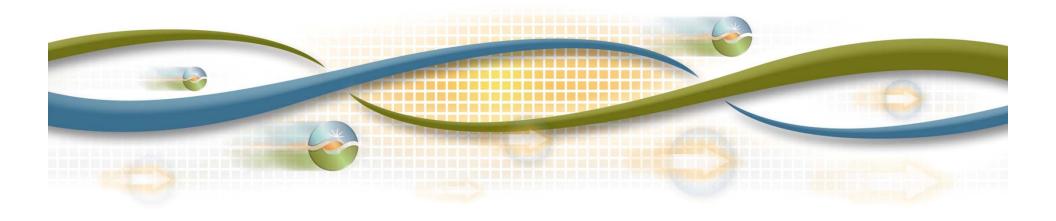


Commitment Costs Comments

Market Surveillance Committee meeting March 30, 2012

Benjamin Hobbs Chair, CAISO MSC The Johns Hopkins University



Principles for Registered Cost Option

- Goldilocks principle:
 - Avoid negative margins that discourage participation
 - Avoid large margins that encourage games
- Proxy should be high enough to accommodate \$/MWh variable costs
 - E.g., fuel, emissions allowances, grid management charges
 - Exclude fixed cost components
- Avoid burdensome recalculations long after fact
 - E.g., if a small source previously exempt from CARB winds up exceeding 25,000 tons CO₂/yr
- Motivate efficiency: incent reductions in variable costs
 - Incentive stronger if payment not reduced if costs reduced
 - Compromise: base payment on benchmark costs rather than actual expenditures



