

Tariff Clarifications Draft Tariff Language - Stakeholder Comments

NUM	Company	Related Tariff Section	Date of Comments	Comments	CAISO Response to Comments
1.	Dynegy		November 23, 2010	General comments – When the CAISO publishes black-lined tariff language for review, could it please do so in Word format, so stakeholders can more easily mark up the language?	
2.	WPTF	1.3.2(f)	November 29, 2010	Should the phrase “Protocol” be replaced by “BPM”?	
3.	Six Cities	4.6.5.1	November 29, 2010	The phrase “including NERC and WECC Reliability Standards and reliability criteria” creates potential ambiguity. The section will be more clear if the reference is simply to the defined term “Applicable Reliability Criteria.”	
4.	Six Cities	6.5.3.3	November 29, 2010	In the fifth line, delete “that.”	
5.	Dynegy	6.5.4.2.2	November 23, 2010	Please explain the proposed changes to 6.5.4.2.2 (replacing “at thirty minutes” with “no later than 40 minutes”) as they are more than just a clarification.	
6.	Dynegy	8.3.1	November 23, 2010	The amount of Ancillary Services procured in the HASP and Real-Time Market is based upon the CAISO Forecast of CAISO Demand for the Operating Hour and RTUC Time Horizon, respectively, net of Self-Provided Ancillary Services (should deleted “respectively” if deleting “and RTUC Time Horizon”).	
7.	Dynegy	8.3.1	November 23, 2010	The proposed edits in the last paragraph of this section are a reminder that the ISO has not yet fully followed through with the requirements of FERC’s 2005 order regarding competitive procurement of voltage support and black start services.	
8.	Dynegy	8.3.3.5	November 23, 2010	The term “network constraints” should be replaced with the new defined term “Transmission Constraints,” or else the ISO should explicitly differentiate between “Transmission Constraints” and “network Constraints.”	
9.	Dynegy	8.9.15.2	November 23, 2010	Because they are part of the CAISO tariff, the sanctions in 8.9.16 are already in effect. Does the ISO mean: “In addition, the sanctions described in Section 8.9.16 shall also be applied”?	

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10.	Dynegy	9.5.2	November 23, 2010	Publication to website – Add “CA” to “ISO” in last line.	<i>This change was also submitted by WPTF on November 29.</i>
11.	RTO Advisors	10.3.6.2	November 23, 2010	RTO Advisors changed “will” to “may” in sub-sections (a) and (b) to reflect the fact that the penalty may not always be applied, in particular, if the materiality threshold is not met, as provided in later sections.	
12.	RTO Advisors	10.3.6.2	November 23, 2010	RTO Advisors added “C” after T+43 in last parenthetical reference in sub-section (c).	
13.	RTO Advisors	10.3.6.3	November 23, 2010	RTO Advisors added a “materiality” threshold below which the SC does not have to submit revised meter data. Clarified that that the deadline is T+43C and that penalties may apply if submitted thereafter. <u>Scheduling Coordinators are not required to submit revised Actual Settlement Quality Meter Data to the CAISO for the Scheduling Coordinator Metered Entities they represent after forty-three (43) calendar days after the Trading Day (T+43C), unless such revised meter data represent increases or decreases of more than 250 megawatt-hours for the Trading Day for a particular TAC Area. In that event, Scheduling Coordinators may continue are required to submit Actual Settlement Quality Meter Data for the Scheduling Coordinator Metered Entities they represent to the CAISO for use in Recalculation Settlement Statements subsequent to the Recalculation Settlement Statement T+38B by after forty-three (43) calendar days after the Trading Day (T+43C) according to timelines established in the CAISO Payments Calendar, but may be subject to Sanction and penalty pursuant to Section 37.5.2.</u>	
14.	Dynegy	11.5.2	November 23, 2010	The “t” in the last line inserted should be capitalized.	
15.	WPTF	11.5.6.3.2	November 29, 2010	The change to this section seems substantive. Please explain.	

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16.	Six Cities	11.5.6.2.5.1	November 29, 2010	<p>The proposed revisions appear to create a substantive change for which there has not been an adequate explanation or justification. The current version allocates Excess Cost Payments arising from transmission-related modeling limitations to PTOs affected by the limitations. The revised language appears to allocate such costs among all PTOs with PTO Service Territories whenever more than one such PTO is affected by the limitation.</p> <p>To preserve the substance of the existing allocation mechanism while clarifying the status of Participating TOs that do not have a PTO Service Territory, the Six Cities suggest modifying the last sentence of the section to read as follows: "If the modeling limitation affects more than one Participating TO, the Excess Cost Payments shall be allocated in proportion to the Transmission Revenue Requirements of the affected Participating TOs with PTO Service Territories."</p>	
17.	Dynegy	11.10.3.2	November 23, 2010	<p>The Scheduling Coordinator's total Operating Reserve Obligation for the hour is the sum of five (5) percent (5%) of its Real-Time Demand (except the Demand covered by firm purchases from outside the CAISO Balancing Authority Area) met by Generation from hydroelectric resources plus seven (7) percent (7%) of its Demand (except the Demand covered by firm purchases from outside the CAISO Balancing Authority Area) met by Generation from non-hydroelectric resources, plus one hundred (100) percent (100%) of any Interruptible Imports, which can only be submitted as a Self-Schedule in the Day-Ahead Market, <u>plus and its scheduled</u> on-demand obligations which it schedules.</p>	
18.	Dynegy	11.10.9.4	November 23, 2010	<p>Allocation of Rescinded Ancillary Services Capacity Payments Payments rescinded pursuant to Sections 8.10.8 and 11.10.9 shall be allocated to Scheduling Coordinators in proportion to their Ancillary Services Obligation CAISO Balancing Authority Area Measured Demand for the same Trading Day. Regulation capacity payments rescinded pursuant to Section 8.10.8.6 shall be allocated to Scheduling Coordinators in proportion to CAISO Dynegy Comments on Tariff Clean-Up Blacklines Balancing Authority Area metered CAISO Demand for the same Trading Day.</p> <p><i>This is more than a "clarification" – it is a change in policy and practice. Why is the proposed allocation period the entire Trading Day and not the hour in which the payments were rescinded? And if rescinded AS payments are allocated in proportion to AS Obligation, why are rescinded regulation payments still allocated based on metered CAISO Demand?</i></p>	

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19.	SVP	11.10.9.4	November 23, 2010	The CAISO proposes to replace the term “CAISO Balancing Authority Area Demand” with “Ancillary Services Obligation” in the first sentence of this Section. The remaining second sentence of this Section continues to allocate rescinded regulation capacity payments to Scheduling Coordinators in proportion to demand. SVP requests the CAISO provide an explanation as to why these two allocations to Scheduling Coordinators use two different proportions?	
20.	PG&E	11.19.1.2	November 23, 2010	PG&E seeks clarification as to the meaning of the phrase “at least twice a month settlement statements.” PG&E understands it to mean that regardless of FERC invoicing frequency, settlement statement charges would appear at least twice a month. This is because an invoice can contain at least two billing periods with FERC charges.	
21.	SCE	11.19.1.2	November 23, 2010	SCE recommends the CAISO accept the following changes to section 11.19.1.2. The changes proposed do not modify the intent of the section but rather, in our view, better describe the process under Payment Acceleration: <u>For Scheduling Coordinators electing monthly settlement of</u> FERC Annual Charges, <u>the charges are assessed</u> each Trading Month in the <u>same semi-monthly</u> Invoice <u>or</u> Payment Advice containing the market Settlement and Grid Management Charge issued in accordance with the CAISO Payment Calendar. <u>For Scheduling Coordinators electing yearly settlement of</u> the FERC Annual Charges, <u>the charges</u> for a given Trading Month that are due annually are issued in accordance with the CAISO Payment Calendar on the same day as the market Invoice <u>or</u> Payment Advice but in a separate Invoice as indicated in Section 11.29.10, and the amounts <u>charged</u> are issued to Scheduling Coordinators <u>in each semi-monthly billing period as indicated in Section 11.29.10.</u>	
22.	Six Cities	11.19.1.2	November 29, 2010	The method for invoicing and collecting FERC Annual Charges remains unclear in the revised language.	
23.	Six Cities	11.19.3.4	November 29, 2010	Addition of the phrase “A portion of the” in the eleventh line of the section creates ambiguity. If “a portion” of such a surcharge or credit is allocated as indicated, how is the portion that is allocated in that manner determined, and how is the remainder allocated?	
24.	PG&E	11.20.5	November 23, 2010	PG&E suggests that the CAISO change “preliminary” to “initial”, and “final” to “Recalc” to be consistent with MRTU terminology.	
25.	PG&E	11.20.7.3	November 23, 2010	PG&E suggests that the CAISO change “preliminary” to “initial”, and “final” to “Recalc” to be consistent with MRTU terminology.	

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26.	Six Cities	11.21.1	November 29, 2010	It appears that there is a word missing from the eleventh line of the section prior to “each”. In the twelfth line, “segment” should be plural.	
27.	Six Cities	11.29.7.1	November 29, 2010	In the last line of the section, insert “to” before “its	
28.	WPTF	11.29.7.3.4	November 29, 2010	The CAISO has struck the notification requirement. This seems substantive. Please explain.	
29.	WPTF	11.29.11	November 29, 2010	The tariff change to not have to remit payment is new. Please describe the rules under which a participant will be excused from payment and/or identify the BPM language that details this.	
30.	SVP	22.4.1	November 23, 2010	Section 22.4.1 is revised to allow notice to be provided by e-mail with confirmation by return e-mail. Based on the ISO’s proposed revision, an e-mail notice is not effective until the original notice recipient provides confirmation of receipt via e-mail. Although this detail makes sense, SVP believes it should be broadcast to all Market Participants to help ensure all involved parties are aware that they should request e-mail confirmation as a part of their original e-mail notice. SVP’s concern is that electronic communications are becoming more commonplace, and some entities may, as they conduct normal business practices, have substantial amounts of notices with the CAISO.	
31.	PG&E	22.11.1	November 23, 2010	While PG&E doesn’t take issue with any of the changes in this section, we do believe, in principal, that the Tariff should govern the language of the BPMs and not vice versa. Therefore, using changes to the BPMs as the main justification for making conforming changes to the Tariff is inappropriate. Substantive changes to the Tariff should come through the stakeholder process and not through the BPM change process.	
32.	MID, TANC	22.11.1.1	November 23, 2010	MID is concerned that the ISO’s current business practices do not comport with the ISO’s Tariff obligations in this regard. In addition, the proposed tariff revisions do not clarify when the ISO believes BPM PRR analyses would be “needed.” Consistent with FERC’s March 28, 2008 Order (122 FERC ¶ 61,271 at P 75), the ISO should maintain the current tariff language requiring the ISO to prepare BPM PRR impact analyses for the Category B PRRs.	

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33.	SVP	22.11.1.1	November 23, 2010	The proposed tariff revisions do not clarify when the CAISO believes such an analysis would be “needed.” Further, while it is true that the CAISO has not prepared impact analyses for every BPM PRR, and that not every BPM PRR warrants an impact analysis, the CAISO’s preparation of such an analysis was relied upon by parties in Docket No. ER07-1257, and the CAISO should not unilaterally renege on its commitment to stakeholders. SVP has concerns with the CAISO’s failure in its current business practices to comply with its Tariff obligations. Therefore, SVP urges the CAISO to either propose more specific Tariff provisions on the instances in which it will prepare BPM PRR impact analyses for Category B revisions or “urgent” BPM PRRs, or otherwise at least commit in its Tariff to prepare BPM PRR impact analyses if requested by a Market Participant.	<i>NCPA supports these comments and the comments on Section 21.11.1.4.</i>
34.	Six Cities	22.11.1.1	November 29, 2010	The proposed revision appears to create a substantive change for which there has not been an adequate explanation or justification. The section as currently in effect requires an impact analysis for a PRR proposed by CAISO management. The explanation in the matrix states that the deletion of this requirement clarifies that “an impact analysis is only required when needed,” but there is no standard or cross-reference to indicate when an impact analysis is needed.	
35.	Dynegy	22.11.1.2	November 23, 2010	The proposed changes to this section would delete the ISO’s requirement to submit a BPM PRR impact analysis. What is the ISO proposing this change, which goes beyond just a “clean-up”?	
36.	Dynegy	22.11.1.4	November 23, 2010	The proposed changes to this section would delete the ISO’s requirement to submit a BPM PRR impact analysis. What is the ISO proposing this change, which goes beyond just a “clean-up”?	
37.	WPTF	22.11.1.4	November 29, 2010	This section has proposed modifications to relieve the ISO of the obligation to prepare an impact analysis. Please explain the basis for this recommended change.	
38.	Six Cities	22.11.1.4(b)	November 29, 2010	The proposed revisions appear to create a substantive change for which there has not been an adequate explanation or justification. The existing tariff language in this subsection requires the ISO to prepare an impact analysis for changes that will affect the CAISO’s systems. The proposed revisions appear to leave it entirely to the ISO’s discretion as to whether an impact analysis will be prepared. Given the significance of this category of proposed changes and the fact that changes to the ISO’s systems likely will require changes to Market Participants’ systems as well, the current tariff language requiring an impact analysis should be retained.	
39.	Dynegy	22.11.1.8	November 23, 2010	The proposed changes to this section would delete the ISO’s requirement to submit a BPM PRR impact analysis. What is the ISO proposing this change, which goes beyond just a “clean-up”?	

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40.	WPTF	22.11.1.8	November 29, 2010	This section has proposed modifications to relieve the ISO of the obligation to prepare an impact analysis. Please explain the basis for this recommended change.	
41.	Six Cities	22.11.1.8	November 29, 2010	The proposed revision creates a substantive change for which there has not been an adequate explanation or justification. Given the nature of the BPM revisions addressed in this section, the current language requiring an impact analysis should be retained	
42.	PG&E	25.1	November 23, 2010	The proposed change effectively expands the range of entities with requirements under this section, however, it is unclear (based on the justification given) what gap this change is meant to address. PG&E would like clarification as to what requirements the CAISO feels are not being met under the Tariff as currently written.	
43.	WPTF	27.1.1	November 29, 2010	Please explain the basis for making the LMP description not inclusive of the elements listed.	
44.	Dynegy	27.1.1.3	November 23, 2010	<p>Marginal Cost of Congestion The Marginal Cost of Congestion at a PNode reflects a linear combination of the Shadow Prices of all binding Transmission Constraints in the network, each multiplied by the corresponding Power Transfer Distribution Factor (PTDF). The Marginal Cost of Congestion may be positive or negative depending on whether a power injection (i.e., incremental Load increase) at that Location marginally increases or decreases Congestion.</p> <p><i>The "s" after Constraint in the first section should not be struck.</i></p>	
45.	Powerex	27.1.1.3	November 24, 2010	<p>Powerex suggests the following change to this section: The Marginal Cost of Congestion at a PNode reflects a linear combination of the Shadow Prices of all binding Transmission Constraints in the network, each multiplied by the corresponding Power Transfer Distribution Factor (PTDF) <u>within the minimum effectiveness threshold</u>. The Marginal Cost of Congestion may be positive or negative depending on whether a power injection (i.e., incremental Load increase) at that Location marginally increases or decreases Congestion.</p>	
46.	MID, TANC	27.4.3.1	November 23, 2010	Clarification is warranted as to whether the undefined reference to "constraint" in the second to last sentence should instead refer to "Transmission Constraint." Clarification is also warranted as to whether the reference to "constrained transmission facility" is synonymous with "Transmission Constraint."	
47.	Dynegy	27.5.1.1	November 23, 2010	The term "network constraints" should be replaced with the new defined term "Transmission Constraints," or else the ISO should explicitly differentiate between "Transmission Constraints" and "network Constraints."	

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48.	MID	27.5.1.1	November 23, 2010	Since the term, “network constraints” is not defined, the ISO should clarify the types of constraints it is proposing to enforce “on the Interties.”	
49.	SVP	27.5.1.1	November 23, 2010	SVP is concerned that the CAISO’s proposal to use the undefined term “network constraints” creates uncertainty on the types of constraints that the ISO would enforce “on the Interties” due to the purported effect on “Congestion Management within the CAISO Balancing Authority Area.” SVP also would appreciate clarification from the CAISO on the types of “network constraints” on the Interties it plans on enforcing pursuant to this proposed revision.	
50.	Dynegy	27.5.2	November 23, 2010	The term “network constraints” should be replaced with the new defined term “Transmission Constraints,” or else the ISO should explicitly differentiate between “Transmission Constraints” and “network Constraints.”	
51.	Dynegy	27.5.3	November 23, 2010	The term “network constraints” should be replaced with the new defined term “Transmission Constraints,” or else the ISO should explicitly differentiate between “Transmission Constraints” and “network Constraints.”	
52.	MID	27.5.3	November 23, 2010	Since the term, “network constraints” is not defined, the ISO should make clear in this section that “Transmission Constraints” are among the constraints it will <u>not</u> enforce for an IBAA.	
53.	SVP	27.5.3	November 23, 2010	Since the term “network constraints” is undefined, SVP would like to ensure that the CAISO does not enforce Transmission Constraints of an IBAA. SVP thus suggests that the CAISO should revise the sentence to state as follows: “The CAISO monitors but does not enforce the network constraints, including Transmission Constraints , for an IBAA in running the CAISO Markets Processes.”	
54.	TANC	27.5.3	November 23, 2010	Since the term, “network constraints” is not defined, the ISO should make clear in this section that “Transmission Constraints” are among the constraints it will not enforce for an IBAA. The ISO should also specify whether it plans on enforcing any types of constraints for an IBAA, and if it does plan on enforcing any constraints, the ISO should indicate the authority it has to do so.	
55.	PG&E	30.5.2.1	November 23, 2010	The changes to this section introduce two new Capitalized Terms: Resource Name and Location Name. As such, PG&E recommends that CAISO create Defined Terms for each of these in Appendix A.	
56.	Dynegy	30.7.3.1	November 23, 2010	The CAISO will not insert or extend a Spinning Reserve and or Non-Spinning Reserve Ancillary Service Bid at \$0 in the Real Time Market for any certified Operating Reserve capacity of a resource unless that resource submits an Energy Bid and fails to submit an Ancillary Service Bid in the Real Time Market.	

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57.	NCPA	30.7.3.1	November 24, 2010	<p>NCPA proposes the following language be added to the new language proposed by the CAISO: The CAISO will not insert or extend any Bid for Regulation Up or Regulation Down in the Real Time Market for a Use-Limited Resource, or a resource designated as a Load-following resource as provided in Section 4.9, except as provided in Section 40.6.8.</p> <p>The concept added here in which a load following resource is not subject to the Regulation Up or Regulation Down Bid extension is consistent with SIBR Rules Version 3.10.8.5 Business Rules No. 41501, 41502, 41503 and 41504. These SIBR rules state that the Generating Resource “is not registered as both a LFR and a ULR for that Trading Hour...”</p>	
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58.	NCPA	30.7.3.1	November 24, 2010	<p>CAISO proposes to add the following language to Section 30.7.3.1: The CAISO will not insert or extend a Spinning Reserve and Non-Spinning Reserve Ancillary Service Bid at \$0 in the Real Time Market for any certified Operating Reserve capacity of a resource unless that resource submits an Energy Bid and fails to submit an Ancillary Service Bid in the Real Time Market.</p> <p>NCPA seeks clarification regarding the elements that trigger Spinning Reserve and Non-Spinning Reserve Ancillary Service Bid extensions or insertions as described in the new language proposed. Per review of SIBR Business Rules No. 41506 and 41507 NCPA is not clear as to all elements that trigger such Bid extensions or insertions, but NCPA understands that one additional element or concept needs to be added to the language to ensure the language is consistent with current business practice. The language implies that a Spinning Reserve and Non-Spinning Reserve Ancillary Service Bid will be extended or inserted for the full range of the resource's certified Operating Reserve capacity if that resource submits an Energy Bid in the Real Time Market but fails to submit an Ancillary Service Bid in the Real Time Market. NCPA understands that such Ancillary Service Bid extensions or insertions would only be triggered if the resource was awarded either Spinning Reserve or Non-Spinning Reserve Capacity (including Self-Provided Capacity) in the Day Ahead Market for an amount that was less than the resource's certified Operating Reserve capacity. NCPA also understands that if the resource did not offer and/or was not awarded either Spinning Reserve and Non-Spinning Reserve capacity in the Day Ahead Market SIBR Rules No. 41506 and 41507 would not extend or insert a Spinning Reserve and Non-Spinning Reserve Ancillary Service Bid at \$0 in the Real Time Market for any certified Operating Reserve capacity as stated in the new language added to Section 30.7.3.1 and Section 30.7.6.1.</p> <p>NCPA requests that CAISO verify that this rule is only triggered if the resource is awarded an amount of Spinning Reserve and Non-Spinning Reserve capacity that is less than the certified Operating Reserve capacity in the Day Ahead Market, and if so, add additional language to Section 30.7.3.1 and Section 30.7.6.1 to capture this additional trigger that would impact whether or not CAISO will extend or insert a Spinning Reserve or Non-Spinning Reserve Ancillary Service Bid for the full certified Operating Reserve capacity range of a resource in the Real Time Market.</p>	
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59.	PG&E	30.7.3.1	November 23, 2010	<p>The changes in these sections include a reference to Section 40.6.8 that adds confusion and should be deleted or modified.</p> <p>In Section 40.6.8 the proposed language is: <i>The CAISO will not insert or extend any Bid for Regulation Up or Regulation Down in the Real Time Market for a Use-Limited Resource. The CAISO will not insert or extend a Spinning Reserve and Non-Spinning Reserve Bid in the Real-Time Market for a Resource Adequacy Resource that is a Use-Limited Resource unless the resource submits an Energy Bid and fails to submit an Ancillary Services Bid.</i></p> <p>In Sections 30.7.3.1 and 30.7.6.1, the ISO proposes: <i>The CAISO will not insert or extend any Bid for Regulation Up or Regulation Down in the Real Time Market for a Use-Limited Resource except as provided in Section 40.6.8. The CAISO will not insert or extend a Spinning Reserve and Non-Spinning Reserve Ancillary Services Bid at \$0 in the Real-Time Market for any certified Operating Reserve capacity of a resource unless that resource submits an Energy Bid and fails to submit an Ancillary Services Bid.</i></p> <p>PG&E suggests that the phrase: "except as provided in Section 40.6.8" be deleted so that the sections parallel section 40.6.8 correctly (i.e. section 40.6.8 doesn't allow for modification of bids for Regulation Up or Regulation Down for a Use-Limited Resource either). With respect to Spinning and Non-spinning Reserves, PG&E suggests that the ISO either parallel word for word the language in 40.6.8, or reference it to reduce confusion.</p>	
60.	SCE	30.7.3.1	November 23, 2010	<p>Changes to sections 30.7.3.1 and 30.7.6.1 include changes extending spinning reserve and nonspinning reserve bids. SCE questions whether the clause "and" between the terms Spinning Reserve and Non-Spinning Reserve should be an "or":</p> <p>The CAISO will not insert or extend any Bid for Regulation Up or Regulation Down in the Real Time Market for a Use-Limited Resource except as provided in Section 40.6.8. The CAISO will not insert or extend a Spinning Reserve and Non-Spinning Reserve Ancillary Service Bid at \$0 in the Real Time Market for any certified Operating Reserve capacity of a resource unless that resource submits an Energy Bid and fails to submit an Ancillary Service Bid in the Real Time Market.</p>	

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61.	Dynegy	30.7.6.1	November 23, 2010	<p>If an AS Bid or Submission to Self-Provide an AS is submitted in the HASP or Real-Time Market for Spinning Reserve and Non-Spinning Reserve with only a partial Energy Bid for the AS capacity, the CAISO will generate an Energy Bid for the uncovered portions. If a Submission to Self-Provide an Ancillary Service is submitted in the HASP or Real-Time Market for Spinning Reserve and Non-Spinning Reserve with only a partial Energy Bid for the AS capacity bid in, the CAISO will not generate or extend an Energy Bid for the uncovered portions.</p> <p>(Why the different treatment?)</p> <p>The CAISO will not insert a Spinning Reserve and or Non-Spinning Reserve Ancillary Service Bid at \$0 in the Real Time Market for any certified Operating Reserve capacity of a resource unless that resource submits an Energy Bid but fails to submit an Ancillary Service Bid in the Real Time Market.</p>	
62.	NCPA	30.7.6.1	November 24, 2010	<p>NCPA proposes the following language be added to the new language proposed by the CAISO: Notwithstanding any of the provisions of Section 30.7.6.1 set forth above, the CAISO will not insert or extend any Bid for Regulation Up or Regulation Down in the Real Time Market for a Use-Limited Resource, <u>or a resource designated as a Load-following resource as provided in Section 4.9,</u> except as provided in Section 40.6.8.</p> <p>The concept added here in which a load following resource is not subject to the Regulation Up or Regulation Down Bid extension is consistent with SIBR Rules Version 3.10.8.5 Business Rules No. 41501, 41502, 41503 and 41504. These SIBR rules state that the Generating Resource “is not registered as both a LFR and a ULR for that Trading Hour...”</p>	

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63.	NCPA	30.7.6.1	November 24, 2010	<p>CAISO proposes to add the following language to Section 30.7.6.1: The CAISO will not insert a Spinning Reserve and Non-Spinning Reserve Ancillary Service Bid at \$0 in the Real Time Market for any certified Operating Reserve capacity of a resource unless that resource submits an Energy Bid but fails to submit an Ancillary Service Bid in the Real Time Market.</p> <p>NCPA seeks clarification regarding the elements that trigger Spinning Reserve and Non-Spinning Reserve Ancillary Service Bid extensions or insertions as described in the new language proposed. Per review of SIBR Business Rules No. 41506 and 41507 NCPA is not clear as to all elements that trigger such Bid extensions or insertions, but NCPA understands that one additional element or concept needs to be added to the language to ensure the language is consistent with current business practice. The language implies that a Spinning Reserve and Non-Spinning Reserve Ancillary Service Bid will be extended or inserted for the full range of the resource's certified Operating Reserve capacity if that resource submits an Energy Bid in the Real Time Market but fails to submit an Ancillary Service Bid in the Real Time Market. NCPA understands that such Ancillary Service Bid extensions or insertions would only be triggered if the resource was awarded either Spinning Reserve or Non-Spinning Reserve Capacity (including Self-Provided Capacity) in the Day Ahead Market for an amount that was less than the resource's certified Operating Reserve capacity. NCPA also understands that if the resource did not offer and/or was not awarded either Spinning Reserve and Non-Spinning Reserve capacity in the Day Ahead Market SIBR Rules No. 41506 and 41507 would not extend or insert a Spinning Reserve and Non-Spinning Reserve Ancillary Service Bid at \$0 in the Real Time Market for any certified Operating Reserve capacity as stated in the new language added to Section 30.7.3.1 and Section 30.7.6.1.</p> <p>NCPA requests that CAISO verify that this rule is only triggered if the resource is awarded an amount of Spinning Reserve and Non-Spinning Reserve capacity that is less than the certified Operating Reserve capacity in the Day Ahead Market, and if so, add additional language to Section 30.7.3.1 and Section 30.7.6.1 to capture this additional trigger that would impact whether or not CAISO will extend or insert a Spinning Reserve or Non-Spinning Reserve Ancillary Service Bid for the full certified Operating Reserve capacity range of a resource in the Real Time Market.</p>	
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64.	PG&E	30.7.6.1	November 23, 2010	<p>The changes in these sections include a reference to Section 40.6.8 that adds confusion and should be deleted or modified. In Section 40.6.8 the proposed language is:</p> <p><i>The CAISO will not insert or extend any Bid for Regulation Up or Regulation Down in the Real Time Market for a Use-Limited Resource. The CAISO will not insert or extend a Spinning Reserve and Non-Spinning Reserve Bid in the Real-Time Market for a Resource Adequacy Resource that is a Use-Limited Resource unless the resource submits an Energy Bid and fails to submit an Ancillary Services Bid.</i></p> <p>In Sections 30.7.3.1 and 30.7.6.1, the ISO proposes: <i>The CAISO will not insert or extend any Bid for Regulation Up or Regulation Down in the Real Time Market for a Use-Limited Resource except as provided in Section 40.6.8. The CAISO will not insert or extend a Spinning Reserve and Non-Spinning Reserve Ancillary Services Bid at \$0 in the Real-Time Market for any certified Operating Reserve capacity of a resource unless that resource submits an Energy Bid and fails to submit an Ancillary Services Bid.</i></p> <p>PG&E suggests that the phrase: "except as provided in Section 40.6.8" be deleted so that the sections parallel section 40.6.8 correctly (i.e. section 40.6.8 doesn't allow for modification of bids for Regulation Up or Regulation Down for a Use-Limited Resource either). With respect to Spinning and Non-spinning Reserves, PG&E suggests that the ISO either parallel word for word the language in 40.6.8, or reference it to reduce confusion.</p>	
65.	SCE	30.7.6.1	November 23, 2010	<p>Changes to sections 30.7.3.1 and 30.7.6.1 include changes extending spinning reserve and nonspinning reserve bids. SCE questions whether the clause "and" between the terms Spinning Reserve and Non-Spinning Reserve should be an "or":</p> <p>The CAISO will not insert or extend any Bid for Regulation Up or Regulation Down in the Real Time Market for a Use-Limited Resource except as provided in Section 40.6.8. The CAISO will not insert or extend a Spinning Reserve and Non-Spinning Reserve Ancillary Service Bid at \$0 in the Real Time Market for any certified Operating Reserve capacity of a resource unless that resource submits an Energy Bid and fails to submit an Ancillary Service Bid in the Real Time Market.</p>	
66.	Six Cities	31.1	November 29, 2010	<p>The second sentence contains grammatical errors.</p>	

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67.	MID, TANC	31.3.1.3	November 23, 2010	<p>The ISO proposes to revise this Section as reflected in strikethrough and underline, as follows: “In the [Integrated Forward Market (“IFM”)], to the extent the market software cannot resolve a noncompetitive Transmission Constraint utilizing Effective Economic Bids such that S<u>self-</u>Scheduled Load at the LAP level would otherwise be reduced to relieve the Constraint, the CAISO Market software will adjust Non-priced Quantities in accordance with the process and criteria described in Section 27.4.3. For this purpose the priority sequence, starting with the first type of Non-price Quantity to be adjusted, will be: . . . (b) Relax the Constraint consistent with Section 27.4.3.1. No Constraints on Interties with adjacent Balance [sic] Authority Areas will be relaxed in this procedure.” (Emphasis added in bold).</p> <p>Thus, in this Section, the ISO proposes to use the undefined term “constraints” in the four instances highlighted in bold above. The ISO’s proposal to use the undefined term “constraint” in the first instance appears to be a typographical error, as the ISO’s intent appears to be to use a capital “c” when it refers to “Transmission Constraints.” The ISO should clarify or revise the reference to “constraint” in that regard. The second reference to the undefined term “constraints,” also appears to not follow the intent in the first reference to refer to “Transmission Constraints,” and appears inconsistent with the cross-referenced Section 27.4.3, which refers to relaxing “internal Transmission Constraints.” The ISO should clarify or modify its proposal in that regard. The third reference to “constraint” should also be explained given that Section 27.4.3.1, which is cross-referenced refers to “internal Transmission Constraints.” For the last sentence in that section, given that the undefined term “constraints” is defined, the ISO should consider revising the sentence so that it reads, “No constraints, <u>including Transmission Constraints</u>, on the Interties with adjacent Balancing Authority Areas will be relaxed in this procedure.”</p>	
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68.	SVP	31.3.1.3	November 23, 2010	<p>The CAISO proposes to use the undefined term “constraints” in four instances. The CAISO’s proposal to use the undefined term “constraint” in the first instance appears to be a typographical error, as the CAISO’s intent appears to be to use a capital “c” when it refers to “Transmission Constraints.” Can the CAISO confirm this, or otherwise provide a further explanation for this specific change?</p> <p>The second reference to the undefined term “constraints,” also appears to not follow the intent in the first reference to refer to “Transmission Constraints.” It also appears inconsistent with the cross-referenced Section 27.4.3. That Section pertains to CAISO Markets Scheduling and Pricing Parameters, and as proposed to be revised in this draft filing, would also refer to relaxing “internal Transmission Constraints.” Thus, SVP also requests the CAISO provide an additional explanation for this proposed change.</p> <p>In the third instance, the CAISO cross-references Section 27.4.3.1, which is “Scheduling Parameters for Transmission Constraint Relaxation”. That section, however, also refers to “constrained transmission facility,” and “constraint”. None of these “constraint” terms are defined terms. Thus, SVP further requests that the CAISO provide further explanation of this proposed revision - should this instead refer to “Transmission Constraint?”</p> <p>Regarding the last sentence in that Section 31.3.1.3, given that the undefined term “constraints” can lead to a lack of clarity, we recommend the CAISO revise the sentence so that it is clear that the ISO will not relax Transmission Constraints on Interties with other Balancing Authority Areas by revising the sentence as follows: “No constraints, including Transmission Constraints, on Interties with adjacent Balancing Authority Areas will be relaxed in this procedure.”</p>	
69.	WPTF	31.3.1.4	November 29, 2010	<p>In addition, WPTF asks that the CAISO consider the additional clarification in its set of proposed tariff modifications to Section 31.3.1.4 (eligibility to set DA LMP).</p> <p>Section 31.3.1.4 provides that if a generating resource is constraining its inter-hour change in Schedule, the resource cannot be marginal and thus is not eligible to set the LMP. However, WPTF members have found that the CAISO does not allow units to set the LMP for various reasons (including for example, MIP Gap, etc.) even if a unit is not ramp constrained. WPTF ask that this tariff language be clarified to indicate more specifically under which conditions a unit can and cannot set the LMP.</p>	
70.	Dynegy	31.3.3	November 23, 2010	<p>The term “network constraints” should be replaced with the new defined term “Transmission Constraints,” or else the ISO should explicitly differentiate between “Transmission Constraints” and “network Constraints.”</p>	

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71.	Dynegy	31.5.4	November 23, 2010	The term “network constraints” should be replaced with the new defined term “Transmission Constraints,” or else the ISO should explicitly differentiate between “Transmission Constraints” and “network Constraints.”	
72.	Dynegy	34	November 23, 2010	In any given five-minute interval, the RTD optimization looks ahead over multiple five minute intervals utilizes up to a sixty five (65) minute Time Horizon (thirteen (13) five (5) minute intervals),	
73.	Six Cities	34.2	November 29, 2010	In the fifteenth line of the section, change “as” to “at”.	
74.	Dynegy	34.3.1	November 23, 2010	RTED mode of operation for RTD normally runs every five (5) minutes starting at approximately 7.5 minutes prior to the start of the next Dispatch Interval and produces a binding Dispatch Instructions for Energy for the next Dispatch Interval and advisory Dispatch Instructions for multiple Dispatch Intervals over the RTD through at least the next Trading Hour.	
75.	Dynegy	34.3.3	November 23, 2010	The term “network constraints” should be replaced with the new defined term “Transmission Constraints,” or else the ISO should explicitly differentiate between “Transmission Constraints” and “network Constraints.”	
76.	Dynegy	34.5	November 23, 2010	In each run of the RTED or RTCD the objective will be to meet the projected Energy requirements over <u>the applicable forward-looking time period of</u> that run,... <i>(if you want to get picky, “forward-looking”, as a compound modifier, probably should be hyphenated.)</i>	
77.	Six Cities	34.5(2)	November 29, 2010	The revised subsection contains grammatical errors.	
78.	Dynegy	34.9.2	November 23, 2010	<i>The proposed insertion of the phrase “perform periodic testing of Generating Units, including PMax testing” may not be contentious if the periodic testing the CAISO has in mind is testing requested by the Generating unit owner, but could be controversial if it refers to testing that would take place at the CAISO’s request (and therefore could expand the CAISO’s use of exceptional dispatch). Can the CAISO clarify what it intends?</i>	
79.	Six Cities	34.16.3.4	November 29, 2010	The proposed revisions appear to create a substantive change for which there has not been an adequate explanation or justification. The discussion of this section in the matrix does not explain why it is appropriate to delete the specified power factor limits and substitute the non-specific term “established.”	

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80.	Dynegy	34.16.3.4(b)	November 23, 2010	<p>The CAISO may Dispatch Generating Units to increase or decrease MVar output within the established power factor limits of 0.9 lagging to 0.95 leading (or within other limits specified by the CAISO in any exemption granted pursuant to Section 8.2.3.3 of the CAISO Tariff) at no cost to the CAISO when required for System Reliability;</p> <p><i>Striking the express limitations on the CAISO's right to dispatch reactive power and replacing those limitations with an unspecified reference to "established" power factor limits warrants further discussion.</i></p>	
81.	Dynegy	34.16.3.4	November 23, 2010	Misspells "Tariff"	
82.	WPTF	34.16.3.4	November 29, 2010	Why is the ISO removing the .9 to .95 acceptable power factor limits?	
83.	Six Cities	34.17.2	November 29, 2010	It appears that the reference should be to 34.11.2.	
84.	Dynegy	37.2.1.1	November 23, 2010	Dynegy appreciates the proposed clarifying addition to this section.	

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85.	RTO Advisors	37.5.2.1	November 23, 2010	<p>RTO Advisors added the concept of a “material” error. If the SC submits revised meter data, but the data do not meet the definition of a “material error,” the SC will not be sanctioned or penalized.</p> <p>Market Participants shall provide complete and accurate Settlement Quality Meter Data for each Trading Hour and shall correct any errors in such data prior to the issuance of Initial Settlement Statement T+7B or Recalculation Settlement Statement, as relevant <u>no later than forty-three (43) calendar days after the Trading Day (T+43C)</u>. The failure to provide complete and accurate Settlement Quality Meter Data, as required by Section 10 that causes a material error to exist in such Settlement Quality Meter Data after forty-three (43) calendar days after the Trading Day (T+43C) and that results in an error that is discovered after issuance of an Initial Settlement Statement T+7B or Recalculation Settlement Statement, as relevant, shall be a violation of this rule. <u>In addition,</u> Scheduling Coordinators that fail to submit Scheduling Coordinator Estimated Settlement Quality Meter Data that is complete and based on a good faith estimate that reasonably represents Demand and/or Generation quantities for each Settlement Period as required by Section 10 and that results in a <u>material</u> error that is discovered <u>and has not been replaced by Actual Settlement Quality Meter Data</u> after issuance of an Initial Settlement Statement T+7B or Recalculation Settlement Statement, as relevant, forty-three (43) calendar days after the Trading Day (T+43C) shall be a violation of this rule.</p> <p><u>For purposes of this Section 37.5.2, a material error is defined as a change in the meter data of more than 500 megawatt-hours for the Trading Day for a particular TAC Area. Only material errors may be deemed violations under this Section 37.5.2 and subject to Sanction pursuant to Section 37.11.</u></p>	
86.	PG&E	37.8.10	November 23, 2010	<p>While PG&E would like to make substantive comments on elements of these sections, we believe that this is not the right forum to do so, and look forward to the opportunity to provide these comments in a future stakeholder process focused on the Method For Calculating Inaccurate Meter Data Penalty, as well as other provisions relating to Rules of Conduct.</p>	

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87.	RTO Advisors	37.8.10	November 23, 2010	<p>A Market Participant that receives a Sanction may obtain immediate review of the CAISO's determination by directly appealing to FERC, in accordance with FERC's rules and procedures. In such case, the applicable Scheduling Coordinator shall also dispute the Initial Settlement Statement T+38 BD T+7B <u>or Recalculation Settlement Statement, as relevant</u>, containing the financial penalty, in accordance with Section 11. The Initial Settlement Statement T+38 T+7B BD dispute and appeal to FERC must be made in accordance with the timeline for raising disputes specified in Section 11.29.8.2. The penalty will be tolled until FERC renders its decision on the appeal. The disposition by FERC of such appeal shall be final, and no separate dispute of such Sanction may be initiated under Section 13, except as provided in Section 37.9.3.4. For the purpose of applying the time limitations set forth in Section 37.10.1, a Ssanction will be considered assessed when it is included on an Initial Settlement Statement T+38 BD T+7B <u>or Recalculation Settlement Statement, as relevant</u>, whether or not the CAISO accepts a the Scheduling Coordinator's dispute, of such Initial Settlement Statement T+38 BD T+7B pending resolution of an appeal to FERC in accordance with this section or Section 37.9.3.3.</p>	
88.	PG&E	37.11.1	November 23, 2010	<p>While PG&E would like to make substantive comments on elements of these sections, we believe that this is not the right forum to do so, and look forward to the opportunity to provide these comments in a future stakeholder process focused on the Method For Calculating Inaccurate Meter Data Penalty, as well as other provisions relating to Rules of Conduct.</p>	

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89.	RTO Advisors	37.11.1	November 23, 2010	<p>RTO Advisors clarified that the penalty only applies to “material” errors and deleted a heading that did not seem to belong. Changes are not being proposed for the tables.</p> <p>There is no Sanction for the submission of inaccurate Meter Data used for an Initial Settlement Statement T+ 7B. However, an material error in submitted Meter Data that exists after forty-three (43) calendar days after the Trading Day(T+43C) is discovered after issuance of a Recalculation Settlement Statement constitutes a Rule of Conduct violation, as described in Section 37.5.2. The level of the Sanction depends on whether the Scheduling Coordinator or the CAISO discovered the error. An increased penalty will apply for errors that are discovered by the CAISO. Table A1 below shows how the level of the Sanction depends on the following factors: whether or not the Scheduling Coordinator finds the error; whether or not the Scheduling Coordinator owes the market, and whether or not the CAISO performs a re-run of the market or produces a Recalculation Settlement Statement. If the CAISO issues a Recalculation Settlement Statement or performs a re-run, then Settlement to all Scheduling Coordinators is recalculated, and the impact of such re-runs on charges assessed will be considered. A penalty charge equal to thirty (30) percent (30%) of the estimated value of the Energy error will apply if the Scheduling Coordinator discovers the error or seventy-five (75) percent (75%) of the estimated value of the Energy error if the CAISO discovers the error. Penalty assessment and disposition of penalty proceeds will be administered as described in Section 37.9.1 and Section 37.9.4 respectively. A Sanction will not be imposed unless such Sanction is more than \$1,000 for at least one Trading Day during the period for which there was incomplete or inaccurate Meter Data.</p> <p>TABLE A-1 Note to Table A1: The applicable price will be the greater of: (1) the simple average of the relevant twelve (12) five-minute LMPs for each hour in which inaccurate meter data occurred; or (2) \$10/MWh. The applicable price will be the greater of the relevant hourly LMP or \$10/MWh. The LMP used will be the values posted on OASIS for each Trading Hour of the applicable Trading Day period.</p> <p>2. Method for Calculating Inaccurate Meter Data Penalty When there is not a Recalculation Settlement Statement or re-run. If the CAISO does not perform a Recalculation Settlement Statement or re-run, for cases of inaccurate Meter Data, Table A2 will be used to determine and allocate penalty and any market adjustment amount. The market adjustment approximates the financial impact on the market; however, it does not completely reflect all the Settlement consequences of inaccurately submitted Meter Data. The approximated value of the inaccurate Meter Data in question will be calculated and returned to the market based on the average of the pro rata share of Unaccounted for Energy (UFE) charged in the utility Service Area during the period of the inaccurate Meter Data event. The thirty (30) percent (30%) or seventy-five (75) percent (75%) penalty will be distributed as discussed in Section 37.9.4. For cases where the CAISO does not perform a Recalculation Settlement Statement or re-run and the Scheduling Coordinator does not owe the market, then no market adjustment will be performed and no penalty will be assessed.</p>	
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90.	SCE	37.11.1	November 23, 2010	<p>SCE recommends the CAISO remove the following change to section 37.11.1 from the tariff filing, as the change is not a clarification type change but rather significantly alters the timeline of what constitutes a Rule of Conduct violation. The existing tariff states that a Rule of Conduct violation may occur for meter data errors that are discovered after issuance of a Recalculation Settlement Statement¹. Given its definition, the earliest a Rule or Conduct violation could occur is T+38B (52 Calendar days). The CAISO proposed modification of T+43 Calendar days shortens the timeline to submit meter data without penalty significantly, by 9 days. SCE does not view this change as a clarification, but rather, one having both policy and process impacts that require more discussion and review by stakeholders. SCE recommends this change be removed and incorporated into a future stakeholder process on settlement/meter data enhancements:</p> <p>There is no Sanction for the submission of inaccurate Meter Data used for an Initial Settlement Statement T+ 7B. However, an error in submitted Meter Data that exists after forty three (43) calendar days after the Trading Day (T+43C) is discovered after issuance of a Recalculation Settlement Statement constitutes a Rule of Conduct violation. The level of the Sanction depends on whether the Scheduling Coordinator or the CAISO discovered the error. An increased penalty will apply for errors that are discovered by the CAISO.</p>	
91.	Dynergy	39.7.1.2	November 23, 2010	<p>LMP Option</p> <p>The CAISO will calculate the LMP Option for the Default Energy Bid as a weighted average of the lowest quartile of LMPs at the Generating Unit PNode in periods when the unit was Dispatched during the preceding ninety (90) days period for which LMPs that have passed the price validation and correction process set forth in Section 35 are available.</p> <p><i>This is more than a “clean-up”, but given that the price correction process ends at 1700 hours of the eighth calendar day after the Trading Day, this should not impose a huge delay.</i></p>	
92.	MID, TANC	Appendix A	November 23, 2010	<p>Delivery Network Upgrades</p> <p>Since this term is currently defined in the Tariff as, “Transmission facilities at or beyond the Point of Interconnection, other than Reliability Network Upgrades, identified in the Interconnection Studies to relieve Constraints on the CAISO Controlled Grid,” and the proposed term “constraints” is not defined, the ISO should clarify the types of constraints this definition encompasses.</p>	

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93.	SVP	Appendix A	November 23, 2010	<p>Delivery Network Upgrades</p> <p>It is not clear if the term “constraints” would accurately capture the intended definition of this term, which is currently defined in the Tariff as, “Transmission facilities at or beyond the Point of Interconnection, other than Reliability Network Upgrades, identified in the Interconnection Studies to relieve Constraints on the CAISO Controlled Grid.” We request that the CAISO provide further clarification on this revision – such as, should “Transmission Constraints” be used?</p>	
94.	SVP	Appendix A	November 23, 2010	<p>Full Network Model</p> <p>The CAISO’s matrix states that the CAISO intended to capitalize “transmission,” which is appropriate, but the draft Tariff does not adequately reflect this intent. SVP recommends capitalizing the word “Transmission” in the first sentence of this definition.</p>	
95.	SVP	Appendix A	November 23, 2010	<p>Shadow Price</p> <p>“Shadow Price” is currently defined as, “The marginal value of relieving a particular Constraint,” and the ISO proposes to revise the word “Constraint” to “constraint.” SVP notes that in Appendix C, Section C, pertaining to Shadow Price, the ISO proposes to refer to “Transmission Constraint.” Should the definition of “Shadow Price” utilize the term “Transmission Constraint” instead of “constraint”?</p>	
96.	MID, TANC	Appendix A	November 23, 2010	<p>Transmission Constraints Enforcement Lists</p> <p>MID and TANC note that this term does not appear in the most recent version of the ISO Tariff posted on the ISO’s website. In addition, since the ISO is proposing to do away with the term “Constraint” in the Tariff, the ISO should clarify the meaning of the term “Constraint” in the following sentence of that proposed definition: “The definition of the Constraint includes the individual elements that constitute the tTransmission Constraint.”</p>	
97.	SVP	Appendix A	November 23, 2010	<p>Transmission Constraints Enforcement Lists</p> <p>This term does not appear in the most recent version of the CAISO Tariff Appendix A posted on the CAISO’s website. SVP is curious where the original language comes from. Since the CAISO does not plan on defining the term “Constraint,” and capitalized terms in the CAISO Tariff have defined meanings, we also request clarification as to whether the term “Constraint” should be revised to “Transmission Constraint” in the following sentence: “The definition of the Constraint includes the individual elements that constitute the Transmission Constraint.” Further, the terms “Transmission Contingencies” and “Transmission” are not defined in Appendix A, thus SVP requests that the CAISO explain its intentions with respect to the proposed capitalization of the letter “t” in the last line of the definition.</p>	

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98.	PG&E	Appendix A	November 23, 2010	<p>WSCC The deletion of the definition of WSCC is tied to a yet-to-occur event. It appears to be premature. This change should be conditioned on the occurrence of the event (i.e. the termination of the CAISO's RMS agreement with WECC).</p>	
99.	PG&E	Appendix F, Schedule 3	November 23, 2010	<p>PG&E understands that the Transition Period ends as of the end of 2010, at which point much of Appendix F, Schedule 3 will become out-of-date. Therefore, there may be further opportunities for clarifying changes related to the end of the Transition Period.</p>	
100.	SCE	Appendix F, Schedule 3, Section 5.2	November 23, 2010	<p>SCE proposes the following sentence be added to this section. The purpose of the change is to ensure that Participating Transmission Owners (PTO's) will not have to needlessly divide their transmission revenue requirements into "New" and "Existing" components upon expiration of the Transition Period. The ISO has added many similar sentences in this area, stating that certain requirements related to the ten-year transition to grid wide Transmission Access Charge rates cease when the Transition Period expires (January 1, 2011). Without this sentence PTOs would still be required to do this division. Not accepting SCE change would result unnecessary work for PTOs beginning next year.</p> <p>Each Participating TO will develop, in accordance with Section 6 of this Schedule 3, a High Voltage Transmission Revenue Requirement (HVTRR PTO) consisting of a Transmission Revenue Requirement for Existing High Voltage Facility (EHVTRR PTO) and a Transmission Revenue Requirement for New High Voltage Facility (NHVTRR PTO). The HVTRR PTO includes the TRBA adjustment described in Section 6.1 of this Schedule 3. <u>At the conclusion of the ten-year TAC Transition Period, the Transition Charge will cease to apply, and the HVAC will be based on the single CAISO Grid-wide rate. Accordingly the requirement for each Participating TO to divide its HVTRR into new and Existing components shall cease to apply.</u></p>	
101.	MID, TANC	Appendix L, Section L.1.3	November 23, 2010	<p>In Section L.1.3 of this Appendix, the ISO proposes to revise the provision as follows: OTC "is the TTC reduced by any operational €constraints caused by seasonal derates or Outages. . . ." In Section L.4 of this Appendix, the ISO proposes to revise the provision, in pertinent part as follows: "The process for developing TTC or OTC is the same with the exception of inclusion or exclusion of operating Transmission Constraints based on system conditions being studied. Accordingly, further description of the process to determine either OTC or TTC will refer only to TTC." The ISO should clarify the reasons for referring to the undefined term "constraints" in Section L.1.3 given that it proposes to use the defined term "Transmission Constraints" in Section L.4.</p>	

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102.	SVP	Appendix L, Section L.1.3	November 23, 2010	We request that the CAISO clarify why, in Section L.1.3, the CAISO proposes to use the undefined term “constraints,” but in Section L.4, the CAISO proposes to use the defined term “Transmission Constraints.”	
103.	MID, TANC	Appendix L, Section L.4	November 23, 2010	In Section L.1.3 of this Appendix, the ISO proposes to revise the provision as follows: OTC “is the TTC reduced by any operational € constraints caused by seasonal derates or Outages. . . .” In Section L.4 of this Appendix, the ISO proposes to revise the provision, in pertinent part as follows: “The process for developing TTC or OTC is the same with the exception of inclusion or exclusion of operating <u>Transmission</u> Constraints based on system conditions being studied. Accordingly, further description of the process to determine either OTC or TTC will refer only to TTC.” The ISO should clarify the reasons for referring to the undefined term “constraints” in Section L.1.3 given that it proposes to use the defined term “Transmission Constraints” in Section L.4.	
104.	SVP	Appendix L, Section L.4	November 23, 2010	We request that the CAISO clarify why, in Section L.1.3, the CAISO proposes to use the undefined term “constraints,” but in Section L.4, the CAISO proposes to use the defined term “Transmission Constraints.”	
105.	SVP	Appendix P, Section 11.5	November 23, 2010	This Section pertains to referrals of market violations to FERC by the Department of Market Monitoring. The CAISO sought to revise all instances of “the Commission” to “FERC”. In one instance however, SVP suggests the reference should be to “FERC or FERC Staff” to conform to the original intent of the Section.	