

## Stakeholder Comments Template

### **Subject: 2012 Congestion Revenue Rights Tariff Clarifications Draft Proposal**

Submitted by	Company	Date Submitted
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SCE thanks the CAISO for bringing these tariff issues to light. SCE supports the proposal<sup>1</sup> with only modest modifications. SCE reiterates its concerns about PNode Migration and the need for consistent treatment of Load Migration in the Tariff and BPM. In addition, the Attachment to these comments restates the proposed tariff and adds two redline modifications

#### **Consistent Load Migration Treatment is required throughout the BPM and Tariff.**

SCE has identified apparent inconsistencies between Section 36.8.3.5.1<sup>2</sup> as proposed, the current tariff and the BPM. The current Tariff and the BPM both indicate that the historical load is modified for Load Migration before SEQ is calculated. This would make deducting Load Migration from SEQ unnecessary. There are at least four places that discuss modifications for Load Migration:

1. The balance of 36.8.3.5.1 where an additional constraint limits PNP nominations to 50% of the Adjusted Load Metric modified for Long Term CRRs. SCE asks that the CAISO consider this section as a whole to assure that it is internally consistent.
2. Tariff Sections 36.8.5, 36.8.2.1 and CRR BPM Section 8.2.1 all describe modifications to historical load based on load migration as opposed to the proposed methodology which would modify SEQ.

SCE asks that all of these sections be made consistent with current load migration methodology and the proposal itself.

#### **SCE Reiterates its Understanding that Migration of Retired PNodes will not Lead to Resettlement of Past Transactions.**

SCE supports the retroactive movement of Retired CRR PNodes to the closest electrically connected and biddable PNode with the understanding that such retroactive changes will not resettle any past transactions.<sup>3</sup>

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<sup>1</sup> CAISO, 2012 Congestion Revenue Rights Tariff Clarifications Draft Proposal, 2012

<sup>2</sup> Ib. §3.1

<sup>3</sup> Ib. §3.4

## Attachment

## Tariff Excerpt 36.8.3.5.1

In all annual CRR Allocations after CRR Year One, an LSE or a Qualified OBAALSE may make PNP nominations up to the lesser of: (1) two-thirds of its Seasonal CRR Eligible Quantity, minus the quantity of Long Term CRRs allocated in the immediately preceding Seasonal CRR Allocation for each season, time of use period and CRR Sink for that year; minus any reduction for net loss of Load or plus any increase for net gain of Load through retail Load Migration as described in Section 36.8.5.1 or, (2) the total quantity of Seasonal CRRs allocated to that LSE in the previous annual CRR Allocation, minus the quantity of ~~previously allocated~~ Long Term CRRs allocated in the immediately preceding Seasonal CRR Allocation for each season, time of use period and CRR Sink, and minus any reduction for net loss of Load or plus any increase for net gain of Load through retail Load Migration as described in Section 36.8.5.1.

## Tariff Excerpt 36.7.3

CRR Holders must report to the CAISO by way of the Secondary Registration System all bilateral CRR transactions consistent with the terms of this CAISO Tariff and the Business Practice Manuals. Both the transferor and the transferee of the CRRs must register the transfer of the CRR with the CAISO using the Secondary Registration System ~~at least~~ five (5) Business Days prior to the effective date of transfer of revenues associated with a CRR, or with sufficient time necessary for the CAISO to evaluate the credit-worthiness of the transferor and transferee, whichever is shorter.