

Western Area Power Administration, Sierra Nevada Region, appreciates the opportunity to comment on the CAISO's FERC Order 764 Compliance 15-minute Scheduling and Settlement Revised Straw Proposal dated February 5th, 2013.

1. From page 21, a "merit order list" will be created based on penalized energy bids, limiting the number of e-tags being accepted for IFM physical market awards. Will TOR and ETC rights be considered in the merit order list rankings? Is there protection in place to ensure these rights are not compromised?

2. Will there be more examples forthcoming of how Load will be settled? There was discussion at the last Stakeholder meeting on February 12th, 2013 of settling Load possibly two or possibly three times. What are the determining factors in how many times Load is settled? Will there be a separate Stakeholder session on the settlement calculations, the potential large increase in settlement billing determinants, and at what level these charges will appear when aggregated into the CAISO settlements system?

Thank you,

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