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Reliant Energy Power Generation, Inc. et al.

Summary of Response and Counterclaim
by SDG&E and PG&E
filed July 30, 1999

Case No. 7119829599

1 Reliant Energy’s claim to be paid for ancillary service capacity provided under
2 Reliability Must Run (“RMR”) rate schedules should be denied because the CAISO Tariff does not
3 authorize such payments. Because owners of RMR units are paid for such service under RMR rate
4 schedules, even if the Tariff allowed such payments this would result in improper double recovery.
5 Because the Tariff does not authorize payments for RMR ancillary service capacity, SDG&E and
6 PG&E claim that CAISO should refund to Scheduling Coordinators substantial amounts improperly
7 billed and previously paid by load-serving Market Participants.
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