

## Amber Power LLC Comments on Stakeholder 2019 Budget and Grid Management Charge Process

6 August 2018

We would like to comment on a particular Charge Code CC 4575 SCID Fee Monthly charge of \$1,000 if statement is produced for a Scheduling Coordinator in a given month. This charge appears to be applied uniformly at \$1,000 per SCID or CRR Account holder ID as long as there is a billing activity in a given month.

We are questioning the justification of such flat fee. If, as an example, market participants collectively add 10 SCIDs, such addition will generate \$10,000 per month in fees for the ISO. However, it does not require an additional full-time analyst to produce 10 additional billing streams of settlement statements and invoices. The additional cost of computer processing is probably closer to zero.

Furthermore, other ISOs, such as PJM, MISO, SPP, and ERCOT, practices of which we reviewed, do not charge for additional market participant IDs.

Given the apparent misalignment of cost causation with cost allocation, we request the review and appropriate adjustment of Charge Code 4575 in the 2019 Budget and Grid Management Charge Process.

Thank you,

Michael Rosenberg