

## **COMMENTS OF THE ALLIANCE FOR RETAIL ENERGY MARKETS ON CAISO'S 2012 CRR TARIFF CLARIFICATIONS**

The Alliance for Retail Energy Markets (AReM)<sup>1</sup> has reviewed the CAISO's 2012 CRR Tariff Clarifications, which were issued April 25, 2012, and finds them generally acceptable. AReM provides the following minor comments.

### **Priority Nomination Process**

The proposed language for the priority nomination process is confusing and AReM members are concerned that the words do not seem to match the CAISO's actual practice. AReM suggests that the CAISO simply refer to "adjustments for load migration," rather than attempt to explain in words precisely how the CAISO will handle the determination of the Seasonable Eligible Quantity (SEQ) and sink upper bound (SUB) for load-gaining and load-losing LSEs.

### **Seasonal Eligible Quantities for Tiers 2 and 3**

The proposed language does not appear to address how the CAISO handles load migration CRRs. Has the CAISO considered adding that explanation?

### **CRR PNode Retirement Process**

AReM supports this proposal. It would allow the AReM members to liquidate load migration and long-term CRRs that were allocated on terminated PNodes.

*Provided by:  
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On Behalf of AReM*

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<sup>1</sup> AReM is a California non-profit mutual benefit corporation formed by electric service providers that are active in the California's direct access market. This filing represents the position of AReM, but not necessarily that of a particular member or any affiliates of its members with respect to the issues addressed herein.