

California Large Energy Consumers Association comments on Real-Time Imbalance Energy Offset Straw Proposal

From: Barkovich, Barbara

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To: Lo, Edward

Subject: Real-Time Imbalance Energy Offset Issue

The California Large Energy Consumers Association supports the position taken by CMTA and EUF in favor of the two-tier allocation of the real time imbalance energy offset. We are surprised by the size of the offset and believe that the CAISO should continue to investigate the causes for this amount and to continue to reduce it. The two-tier allocation of these costs, while not ideal, is more cost-based than an allocation on the basis of metered demand. We also support the proposal to continue to allocate the real-time marginal cost of losses credit on the basis of measured demand. Apologies for these brief comments, but there has not been much time to respond.
Barbara Barkovich