

**COMMENTS OF THE CALIFORNIA COGENERATION COUNCIL, ENERGY PRODUCERS
AND USERS COALITION AND THE COGENERATION ASSOCIATION OF CALIFORNIA
ON THE DRAFT TARIFF LANGUAGE – REGULATORY MUST TAKE GENERATION
TARIFF AMENDMENT**

Submitted By	Company	Date Submitted
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The California Cogeneration Council, Energy Producers and Users Coalition, and the Cogeneration Association of California (CHP Parties) have not had time to review the draft tariff language in detail with their members, consequently we can only provide brief, high level comments at this time. We expect to submit more detailed comments after the stakeholder conference call on May 31st.

In general, it appears that the Regulatory Must-Take Generation (RMTG) Tariff Amendment aligns well with the RMTG Policy Decision approved by the CAISO Board of Governors on May 16, 2012. The CHP Parties raise only one issue at this time:

- i. In Section 30.5.2.2, the CHP Parties propose deleting the words, “and electric” from the following sentence:

Scheduling quantities that a Scheduling Coordinator identifies as Regulatory Must-Take Generation for a CHP Resource shall be limited to the quantity necessary to meet the reasonably anticipated industrial host’s thermal ~~and electric~~ requirements and shall not exceed any established RMTmax values.

Although this amendment accurately reflects the Policy Decision, the CHP Parties believe that the electric requirements of the host are not relevant with respect to what portion of the facility’s electrical output exported to the grid requires RMTG protection.

We look forward to further discussion on the stakeholder conference call on May 31st.