

California Department of Water Resources State Water Project

California Department of Water Resources State Water Project Comments On CAISO 2015 GMC Update Tariff

August 13, 2014

On August 5, 2014, CAISO posted the 2015 GMC tariff changes. California Department of Water Resources State Water Project (SWP) appreciates the opportunity to provide comments.

SWP reviewed the final proposal on 2015 GMC Update. CAISO proposed 2015 GMC will be made up of three service categories and seven fees. These seven fees consist of: 1) Bid Segment Fee, 2) Inter-SC Trade Fee, 3) CRR Transaction Fee, 4) TOR Fee, 5) SCID Fee, 6) EIM Administrative Charge/Fee, and 7) EIR Forecast Fee. It remains unclear whether or not the EIM Administrative Charge/Fee and the EIR Forecast Fee, are deducted from the respective three service categories, similar to the other five GMC fees. In response to SWP's previous comments in this stakeholder process, CAISO stated the EIM Administrative Charge/Fee and EIR Fee will be included in miscellaneous revenues, which are included in the GMC revenue requirement formula under CAISO Other Costs and Revenues, but that these Charges/Fees are not part of the 2015 GMC rate structure.

In Appendix F Rate Schedules, Schedule 1, Part A, the CAISO proposes that an updated cost of service study will be done every three years starting in 2018, and that this includes the EIM Administrative Charge. SWP believes this study should be done annually for a new market charge such as EIM whose effects on costs are still less certain.