

Section number	Party	Comment	ISO Response
Definition of Forecasted Movement	Six Cities	Change “resources” to “resource’s”.	Accept
11.25.2.3.1(a)(2)	Puget Sound Energy	<p>EIM Area on a daily basis according to the categories as set forth in this Section 11.25.2.3; and (2) allocate the daily amounts to Scheduling Coordinators as set forth in this Section 11.25.2.3.</p> <p>Delete section 27.10, Flexible Ramping Constraint</p>	Accept
11.25.2.3.2(a)(2)	Six Cities	In the first line, change “Resource” to “Resources” and change “schedule” to “schedules”.	Accept
11.25.2.3.4(a)(2)	Six Cities	In the second line, delete “to” after “Section 11.25,”.	Accept
11.25.2.2(a)(1)	ISO	We will clarify that uncertainty movement is only calculated for resources that are being scheduled based upon a forecast.	
11.25.1	Six Cities	With respect to sub-sections 11.25.1.1.1 and 11.25.1.1.2, please explain why FRDP would be used in settling upward Forecasted Movement? Similarly, with respect to sub-sections 11.25.1.2.1 and 11.25.1.2.2, why would FRUP be used in settling downward Forecasted Movement? Is it not the case that Forecasted Movement for a particular resource occurs in only one direction within a given interval? If that is so, it would seem that only FRUP would apply to upward Forecasted Movement, and only FRDP would apply to downward Forecasted Movement.	The FRP design is that upward forecasted movement is paid the FRUP and charged the FRDP and that downward forecasted movement is paid the FRDP and charges the FRUP. Though a resource can only move in one direction in an interval, both FRUP and FRDP may be non-zero prices.

11.25.2	Puget Sound Energy	<p><u>11.25.2 Settlement of Uncertainty Requirement.</u></p> <p><u>11.25.2.1 Payment to Resources. On a daily basis, the CAISO will settle awards to resources for providing the Uncertainty Requirement at the applicable FRUP or FRDP less any payment rescission for each interval pursuant to Section 11.25.3.</u></p>	Accept
11.25.1.1 11.25.1.2 44.3	PG&E	<p>Sections 11.25.1.1 and 11.25.1.2 both refer to Forecasted Movement for a resource calculated pursuant to Section 44.3. Section 44.3 does not separate Forecast Movement into movement up and movement down but only calculates movement. Consequently, the settlements calculations in Sections 11.25.1.1 and 11.25.1.2 are identical and will settle movement either up or down. The sections are repetitious and could be construed to pay a resource twice for forecast movement. It is suggested skipping 11.25.1.2 and retitling 11.25.1.1 to “Forecasted Movement”.</p>	The CAISO has combined and clarified these sections.
11.25.1.2	Puget Sound Energy	<p><u>11.25.1.2 Downward Forecasted Movement</u> *</p> <p><u>11.25.1.2.1 FMM. The CAISO will settle downward FMM Forecasted Movement with Scheduling Coordinators as follows:</u> *</p> <p><u>(a) the product of the Forecasted Movement calculated for each resource pursuant to Section 44.3 in MWs and the FMM FRUP:</u> *</p> <p><u>and</u></p> <p><u>(b) the product of the Forecasted Movement calculated for each resource pursuant to Section 44.3 in MWs and the product of the FMM FRDP and negative one.</u></p>	Accept
11.25.1.3	Six Cities	<p>Please explain the source or sources of any residual Forecasted Movement settlement amounts.</p> <p>In the second line, change “the Section 11.25.1 to Scheduling Coordinator metered” to “Section 11.25.1 to each Scheduling Coordinator’s metered”.</p> <p>In the third line, insert “of” after “share”.</p>	This is a neutrality account for any residual amounts due to rescission of forecasted movement at the RTD price, which was originally procured at the FMM price and was not allocated to metered demand.

			Accepting grammatical changes.
11.25.1.3		<p><u>11.25.1.3 Allocation of Residual Forecasted Movement Settlements.</u></p> <p><u>The CAISO will settle amounts remaining after settlement of Forecasted Movement pursuant to the Section 11.25.1 to Scheduling Coordinator metered EIM Demand or metered CAISO Demand in proportion to its share the total metered EIM Demand and metered CAISO Demand.</u></p> <p><u>11.25.2 Settlement of Uncertainty Requirement.</u></p> <p><u>Authority Area in the EIM Area and within the EIM Area as set forth in this Section 11.25.2.3; and</u></p> <p><u>(4) allocating the monthly amounts in each category to Scheduling Coordinators as set forth in this Section 11.25.2.3.</u></p> <p><u>11.25.2.3 Allocation of Charges to Categories.</u></p> <p><u>(3) for the non-Participating Load category, as the difference between-</u></p> <p><u>(A) the CAISO Forecast of CAISO Demand, the CAISO forecast of Balancing Authority Area EIM Demand, or the CAISO forecast of EIM Area EIM Demand, as applicable, of the binding interval in the next RTD run; and</u></p>	<p>The CAISO will not settle with the SC for a participating resource because they do not represent metered demand. The EIM Entity SC will be allocated this amount.</p>
11.25.2.3.1	Puget Sound Energy	<p><u>11.25.2.3.1</u></p> <p><u>(4) allocating the monthly amounts in each category to Scheduling Coordinators as set forth in this Section 11.25.2.3.</u></p> <p><u>11.25.2.3 Allocation of Charges to Categories.</u></p> <p><u>(3) for the non-Participating Load category, as the difference between-</u></p> <p><u>(A) the CAISO Forecast of CAISO Demand, the CAISO forecast of Balancing Authority Area EIM Demand, or the CAISO forecast of EIM Area EIM Demand, as applicable, of the binding interval in the next RTD run; and</u></p>	Accept
11.25.2.3.2	Puget Sound Energy	<p><u>(3) for the non-Participating Load category, as the difference between-</u></p> <p><u>(A) the CAISO Forecast of CAISO Demand, the CAISO forecast of Balancing Authority Area EIM Demand, or the CAISO forecast of EIM Area EIM Demand, as applicable, of the binding interval in the next RTD run; and</u></p>	Accept

		<p><u>Demand, and/or the CAISO forecast of EIM Area</u> <u>EIM Demand, as applicable, for the first advisory</u> <u>interval in the current RTD run.</u></p>	
11.25.2.3.4(d)	Six Cities	In the fifth line, change “ration” to “ratio” and change “its” to “their”.	Accept
11.25.2.3.4	ISO	<p>1) Take out “Uncertainty Movement and “ in section 11.25.2.3.4 (c), which now reads:</p> <p style="padding-left: 40px;">(c) Intertie Category. The CAISO will allocate the Uncertainty Awards costs of the Intertie category to Scheduling Coordinators for each non-Dynamic System Resource and export based on the sum of the resource’s Operational Adjustment—</p> <p>2) Include qualification to use “magnitude of” negative values in section 11.25.2.3.4 and subsections. This is because the different positive and negative values across resources for the same interval should not be netted together. Also in two cases, replaced “absolute value” with “magnitude of”, to make it consistent.</p> <p>e.g.</p> <p style="padding-left: 40px;">11.25.2.3.4 Allocation to Scheduling Coordinators.</p> <p style="padding-left: 40px;">(a) Non-Participating Load Category. The CAISO will allocate the Uncertainty Awards costs of the non-Participating Load category to Scheduling Coordinators—</p> <p>(1) for upward Uncertainty Award cost in proportion to the Scheduling Coordinator’s magnitude of negative non-Participating Load UIE, excluding the non-Participating Load of an MSS that has elected to load-follow according to an MSS Agreement, without netting</p>	

		that UIE across Settlement Intervals, to the total magnitude of such negative non-Participating Load UIE, without netting that UIE across Settlement Intervals, in the Balancing Authority Area or EIM Area as applicable, and	
11.25.2.3.1.4	PG&E	Per Section 7.3 of the January 25, 2016 Addendum Draft Final Technical Appendix, the CAISO had proposed eliminating the daily settling in favor of a single monthly settlement; explicitly identifying it as a significant simplification over the resettlement process identified here. Thus, this would appear to be in contrast to proposed language in section 11.25.2.3.1.4.	The CAISO recognizes that previously the CAISO expected to implement the more simplified monthly settlement for these amounts. However, as it proceeded towards implementation it determined that, because it calculates the bid cost recovery amounts on a daily basis, it must first conduct the daily settlement and then resettle the amounts monthly. This does not change the value of the monthly settlement.
11.8.4.2	Puget Sound Energy	<p><u>(d) The Forecasted Movement and Uncertainty Awards Settlement Amounts as calculated pursuant to Section 11.25 are included in the RTM Market Revenues calculation, not including:</u></p> <p><u>(1) the amounts rescinded pursuant to Section 11.2.5.3;</u></p> <p><u>(2) Forecasted Movement revenue when there are changes in Self-Schedules across consecutive Trading Hours; and</u></p> <p><u>(3) Forecasted Movement revenue when there are changes in EIM Base Schedules across consecutive Trading Hours without Economic Bids.</u></p>	Accept
11.8.4.2	CAISO	Clarifying application of the Real-time Performance Metric and Persistent Deviation Metric applies only to imbalance energy related revenue and not FRP or Ancillary Services related revenue.	
29.34(m)(5)	Six Cities	In the eleventh line, insert “and” before “will”.	Accept

29.34(l)(4)(A)	Six Cities	<p>In the fourth line, change “minute” to “minutes”.</p> <p>In the fifth and sixth lines, add “capacity requirements of the” before “Balancing” and change “EIM Area’s capacity requirements” to “EIM Area”.</p>	Accept.
29.34(n)(1)	Puget Sound Energy	<p>Constraint capacity requirements; and</p> <p>(B) the CAISO will hold the EIM Transfer limit into and/or from the EIM Entity Balancing Authority Area as specified in Section 29.34(n)(2) at the value for the last 15-minute Trading Interval interval.</p> <p><i>Comment [ZG55]: Clarify language to limit transfer only in the direction corresponding to the direction of the flex test failure</i></p>	Accept
29.11	Puget Sound Energy	<p>29.11. Settlements And Billing For EIM Market Participants.</p> <p style="text-align: center;">***</p> <p>(g) Flexible Ramping Constraint Allocation.</p> <p>(1) Calculation. The CAISO will calculate awards for Flexible Ramping Constraint capacity according to Section 11.25.2 and rescission for non-performance in accordance with 11.25.3, except that the Real Time Ancillary Service Market Price for Spinning Reserves will be deemed to be zero in determining awards to EIM Participating Resources.</p> <p>(2) Apportionment of Costs. The CAISO will apportion Flexible Ramping Constraint costs to each EIM Entity Balancing Authority Area and the CAISO Balancing Authority Area in accordance with Section 11.25.4.</p> <p>(3) Cost Allocation. The CAISO will allocate each EIM Entity’s Flexible Ramping Constraint costs to the applicable EIM Entity Scheduling Coordinator in accordance with Section 11.25.5(b).</p> <p style="text-align: center;">***</p> <p><i>Formatted: Strikethrough</i></p> <p><i>Comment [ZG54]: Existing Section 2 should be removed</i></p>	Accept
16 and 17	ISO	<p>Update the Tariff Sections for Existing Transmission Contracts and Transmission Ownership Rights to include Flexible Ramp Product settlement. They are both responsible for Imbalance Energy Settlement, and Ancillary Service Settlement.</p> <p>Review the tariff language for the calculation of Uncertainty Movement of Supply. Based upon a recent update to the BRS. Uncertainty Movement will only be calculated for subset of Variable Energy Resources. We will not calculate Uncertainty Movement for other Generators.</p>	Added language to new draft.
44.3.1	Six Cities	<p>In the second and third lines, to make clear that all Forecasted Movement calculations are made on an individual resource basis, change “System Resources” to “System Resource”; change “Pseudo-Ties” to</p>	Accept

		“Pseudo-Tie”; change Non-generating Resources” to “Non-generating Resource”; and change “PDRs” to “PDR”.	
44.3.1.1	Six Cities	In the fourth line, change “it’s” to “its”.	Accept
44.3.1.2	Six Cities	In the second and third lines, insert “the” before “difference” and before “first”.	Accept
44.2.3.1	Puget Sound Energy	<p>44.2.3 Eligibility for Uncertainty Award.</p> <p>44.2.3.1 Generally. All Each resource that have has an Economic Bid in the RTM that and can be dispatched on a five-minute basis by RTD are is eligible for receiving Uncertainty Awards satisfying the Uncertainty Requirement for the BAA in which the resource is located.</p> <p>44.2.3.2 Suspension. If the CAISO deems the resource to be non-compliant, the CAISO will suspend the resource’s eligibility as specified in Section 34.13.2.</p>	<p>Formatted: Font: Bold</p> <p>Comment [ZGS6]: Please specify the relationship between Uncertainty Awards and Uncertainty Requirements and which awards meet which requirements (i.e. resource award meets its BAA requirement)</p> <p>Formatted: Font: Bold</p>