

STAKEHOLDER COMMENTS ON DRAFT PDR TARIFF LANGUAGE

| Company | Comments | Related Tariff Section |
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| PGE | There is a missing “J” at the end of this section. | 4.5.1.1.3 |
| PGE | <p>The need for improved Tariff clarity is further required since section 4.5.1.1.3 seems to indicate that such agreements are <i>not</i> necessary. This sections states: <i>Nothing in this Section 4.5.1.1.3 or any other provision of the CAISO Tariff shall prohibit one Scheduling Coordinator from registering with the CAISO to submit Bids for Demand Response Services from a Proxy Demand Resource associated with a given meter [or Meter Point] where a different Scheduling Coordinator is registered for Load associated with that meter [or Meter Point].</i></p> <p>The design and support of PDR by PG&E and others was premised on a number of integrated features that must be adopted into the tariff as a whole and complete package.</p> | 4.5.1.1.3 |
| AReM | <p>This section leaves the strong impression that Demand Response Providers (DRPs) are required to sign a separate agreement to participate at the CAISO as if they were a separate entity requiring some kind of registration. Also, the defined term in the definitions states that DRPs are required to execute the “applicable” agreement. I understand, however, that electric service providers (ESPs) wishing to set up their own PDRs and who are already their own Scheduling Coordinators (SCs) are not required to sign any additional agreement to become a DRP (except a PDR agreement). It would be good to clarify the specific requirements of a DRP.</p> | 4.13.1 |
| PGE | <p>Load Serving Entity Agreements – PG&E believes the Draft Tariff inappropriately omits any references to the necessary bilateral agreements between a Demand Response Provider (DRP) and a Load Serving Entity (LSE) to address undue double payment attribute of PDR. PG&E recommends that <i>Section 4.13.1 - Relationship between CAISO and DRP</i> could be expanded to explicitly state such a requirement. Section 4.3 of Appendix B of the Pro Forma Agreement indicates that the DRP must ‘satisfy all applicable rules and regulations of the Local Regulatory Authority’; this provision is not sufficiently explicit to address the need to incorporate the double-payment agreements.</p> <p>As possible changes to address these concerns, PG&E recommends the following tariff additions (changes are in bold):</p> | 4.13.1 |

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| | <p>4.13.1 Relationship Between CAISO and Demand Response Providers.</p> <p><i>The CAISO shall only accept Bids for Energy or Ancillary Services, Submissions to Self-Provide Ancillary Services from Proxy Demand Resources or Submissions of Energy Self-Schedules at Pmin from Proxy Demand Resources if such Proxy Demand Resources are represented by a Demand Response Provider that has entered into a Proxy Demand Resource Agreement with the CAISO, has accurately provided the information required in the Demand Response Application, has satisfied all Proxy Demand Resource registration requirements, and has met standards adopted by the CAISO and published on the CAISO Website. The Proxy Demand Resource Registration process will ensure that a registered Proxy Demand Resource has the approval of the load serving entity whose load may be part of an aggregate Proxy Demand Resource prior to participating in the wholesale markets. Since the load is served by the LSE, and the LSE will pay for Day-Ahead power that is not consumed as a result of the dispatch of the proxy demand resource, the LSE has the ability to approve or reject a proxy demand resource registration. The CAISO shall not accept submitted Bids for Energy or Ancillary Services from a Demand Response Provider other than through a Scheduling Coordinator, which Scheduling Coordinator may be the Demand Response Provider itself or another entity.</i></p> | |
| SDG&E | <p>It isn't clear to SDG&E why the term Demand Response Services is necessary or how it is distinguishable from the term Curtailable Demand. Further, the definition provided in Appendix A, Master Definitions Supplement, ties it to the definition of Proxy Demand Resource which is bound by the terms of the PDR agreement. Demand Response Services do not seem to have the same commercial or legal relationship with the CAISO as defined.</p> | 4.13.2 |
| EnerNOC | <p>The language in this section indicates that while CAISO would normally communicate dispatch instructions to the Scheduling Coordinator, who would then be expected to pass the instructions along to the Generator, Participating Load or Demand Response Provider, CAISO reserves the right to communicate dispatch instructions directly to the generators rather than through Scheduling Coordinators or operators of the PDRs. If "generators" here refers to individual resources and means that CAISO would contact individual customers in a PDR directly, this seems problematic. In many, if not most, cases, assets participating in wholesale markets through DR Providers are directly controlled by the DR Provider, so the Provider is the appropriate entity to receive dispatch instructions to ensure system reliability.</p> <p>One other note that is relevant to several sections but first occurs here is that</p> | 6.3.1 |

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| | <p>the language seems to switch from “Demand Response Provider” to “operators of Proxy Demand Resources.” In other places however, the language refers to “owner or operator of Proxy Demand Resources.” This gets a bit confusing in some places. In many cases the owner and operator are different entities. In many cases, the “operator” seems to be the Demand Response Provider, but that doesn’t seem to apply in every instance either. Please clarify whether you intend for these terms to be interchangeable. If not, an additional definition of PDR “operator” may be required to distinguish that from the DR Provider.</p> | |
| <p>EnergyConnect, Inc.</p> | <p>In Section 8.4.5 (page 14), the obligation to be capable of receiving communications from the CAISO should be limited to the times during which a resource submits bids that might require it to be dispatched. The 24 hour requirement makes no sense if the PDR (or any other resource, for that matter) is only going to be made available between 7 AM and 7 PM, for example.</p> | <p>8.4.5</p> |
| <p>EnerNOC</p> | <p>If there is an objective other than providing the most reliable communication link possible to justify the requirement that a DR Provider who is offering any Ancillary Service must provide a “direct ring down voice communications circuit between the control room operator for the Demand Response Services and the CAISO Control Center” please provide that clarification on the December 4 stakeholder call. Otherwise, if the objective is to provide the most reliable communication link possible, a ring down line is not the only answer. It is our experience that establishing a regular 24x7 phone line, as DR Providers do in other jurisdictions such as PJM, can be more reliable than a ring-down line. This is because it allows entities to leverage redundant services (control rooms, data centers, phone switches, etc.) instead of relying on the single ring down line. If entities are able to provide that type of communication link, it should be equally acceptable to CAISO.</p> | <p>8.4.5</p> |
| <p>PGE</p> | <p>Tariff language inter-mixes the use of ‘Demand Response Provider’ and ‘Proxy Demand Resource’ in an inconsistent manner.</p> | <p>6.3.1</p> |
| <p>EnergyConnect, Inc.</p> | <p>In Section 8.9 (there may also be other places), which party bears the obligation if the owner and operator are different entities? There needs to be clarity around this point for PDR and for loads.</p> | <p>8.9</p> |
| <p>EnergyConnect, Inc.</p> | <p>The language in Section 8.9.3.2 that allows the CAISO to issue a Dispatch Instruction and requires the operator to provide a report regarding the capability of a PDR is ambiguous and likely not a reasonable way to conduct tests. If, as stated in Section 6.3, Demand Response Providers are responsible for carrying out dispatch instructions, then test dispatch instructions should be issued to the Demand Response Provider rather than the owner or operator. Tests should be</p> | <p>8.9.3.2</p> |

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| | conducted by issuing dispatch instructions and observing meter data or telemetry. | |
| EnergyConnect, Inc. | In the discussion regarding settlement quality meter data that begins in Section 10.3 (page 22), LSEs must provide either actual or estimated meter data within 5 days, but Demand Response Providers or their Scheduling Coordinator cannot provide estimated meter data. It's not entirely clear that a) Demand Response Providers must provide actual meter data within 5 days, or b) what the consequences are if they don't. Some additional clarity on this point would be helpful. It would also be helpful to clarify precisely which entity – Demand Response Provider or Scheduling Coordinator – is responsible for providing the CAISO with settlement quality meter data rather than leaving the responsibility vague. | 10.3 |
| PGE | The settlement consequences on not providing SQMD for PDRs is not included or explicitly stated | 10.3.6.1 |
| AReM | This section prohibits the submission of <i>estimated</i> settlement quality meter data (SQMD) for the initial settlements, which are based on T+5 meter data. This raises questions about how the initial settlements will be calculated for the load-serving entities (LSEs) associated with the PDR. If the CAISO plans to do no PDR related calculation until both the LSE and the PDR submit real SQMD, then the CAISO should say so. Further, the CAISO should explain how the initial settlement would work for the LSE associated with the PDR and how it would be trued-up later. | 10.3.6.1 |
| SDG&E | SDG&E seeks a clarification on what action, if any, the CAISO will take to modify estimated SQMD for load associated with a Proxy Demand Resource if the LSE's submits estimated metered load at the CLAP that may be in conflict with final SQMD submitted at T+38C. SDG&E believes that CAISO should be indifferent whether meter data submitted at T+2 is estimated or actual, and would true-up calculations for the first re-calc statement issued at T+ 40 based on any meter data change that came in at T+38C. If SQMD is submitted for the Custom Load Aggregation Point (CLAP) associated with a Proxy Demand Resource within the timeline required for Initial Settlement at T+ 7B whether it includes estimated values or not, will the CAISO calculate Energy delivered on the PDR and add that amount to the LSE Load Resource ID as stated in Section 11.5.2.4 and include that on the Initial Statement at T + 7B without any action required by the PDR SC if it is different than the LSE SC? In particular, SDG&E seeks to ensure that 1) any inaction by the DRP (if different than the LSE) will | 11.1.5 |

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| | not prevent the meter adjustment from being applied on the LSE's Preliminary Statement, and 2) that the PDR energy settlement would be completed in time for the initial statement if the LSE submits the meter data in time. | |
| PGE | Adjustments to LSEs metered load are unduly limited to 'solely for the purpose of setting Uninstructed Imbalance Energy'. A preferable approach would be that all Demand based charges should reflect PDR corrections as well (GMC, UFE, other uplifts). | 11.5.2.4 |
| AReM | As AReM understands it, the CAISO calculates the PDR performance (the metered load drop adjusted through the baseline formula) and then adds this quantity to the associated LSE's meter data for purposes of determining UIE. The tariff describes this process as adding the "Energy delivered by a Proxy Demand Resource" to the LSE's meter data. This description is confusing and AReM recommends revising it. For example, the use of the defined term "Energy" does not describe what is delivered by the PDR, nor does it describe the process that must precede the LSE adjustment. In particular, the tariff makes no reference to the fact that the meter data from the PDR is adjusted by the baseline formula before being added to the LSE meter data. | 11.5.2.4 |
| EnergyConnect, Inc. | The language in 11.6 is not clear. The CAISO should be settling for each Proxy Demand Resource based on a comparison of metered Load and the Customer Baseline. We suggest this paragraph be changed to read, "Settlements for Energy provided from Proxy Demand Resources will be determined by comparing each Proxy Demand Resource's metered Load with its Customer Baseline as established in accordance with the CAISO's applicable Business Practice Manuals." | 11.6 |
| EnergyConnect, Inc. | In Section 16.5.1 (pages 37 and 38), Demand Response Providers should be changed to Proxy Demand Resources if it is the resource that's required to comply rather than the entity. Some clarity on this point would be helpful. | 16.5.1 |
| EnergyConnect, Inc. | In Section 30.6 (page 40), the Day-Ahead Energy Market and the Real-time 5-minute markets are not the same. We recommend the language here be clarified. | 30.6 |
| PGE | PDR exclusion from bidding/scheduling and settlement on the InterTies and Hour Ahead Scheduling Process is missing. | 30.6 |
| PGE | PG&E believes the CAISO has exceeded the requirements/capabilities of (some) PDR. Section 34.9.1 indicates that Exceptional Dispatch (ED) can be issued to PDR. This ability is coupled with the CAISO tariff 4.2.1 that requires market participants to comply with dispatch orders. However some DR | 34.9.1 |

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| | programs to be included as PDR have 'optional' contractual compliance, as such, requiring CAISO ED for PDR may be inappropriate. | |
| SDG&E | It is not clear what is meant by the term "managed" as it as it applies to a PDR (and subsequently Participating Load) that is part of a Resource Adequacy Plan when the SC is different than the LSE. SDG&E suggests this modification to the section "...Load Serving Entity, will be administered by the CAISO in accordance with the terms and conditions..." | 40.6.12 |
| Appendix A - Definitions | | |
| EnergyConnect, Inc. | The definition of Customer Baseline should be changed to note that it is an estimate of a PDR's Load assuming it is not dispatched. | Defined Term: Customer Baseline |
| EnergyConnect, Inc. | The defined term Demand Response Application refers to a software system that is apparently designed to capture information about each demand resource. We recommend this term be changed to "Demand Response Registration System" or some similar term that cannot easily be confused with a document the CAISO might require at some point from aspiring Demand Response Providers. | Defined Term: Demand Response Application |
| EnerNOC | "Demand Response Application" sounds like an application a Demand Response Provider might complete, but the definition seems to refer to forms CAISO uses to report on DR data. This is fairly confusing and would benefit from a new label so as not to be confused with a Proxy Demand Resource Agreement. | Defined Term: Demand Response Application |
| EnerNOC | "Demand Response Services" is used to describe the demand from the PDR that is bid into the Day-Ahead and Real-Time Markets. How does this differ from "Proxy Demand Resource"? | Defined Term: Demand Response Services |
| EnergyConnect, Inc. | The notion of a Demand Response Service appears to be in conflict with a Proxy Demand Resource. Moreover, Proxy Demand Resource appears to be a more appropriate term everywhere Demand Response Service appears. For example, in Section 7.1.3 (f), dispatch instructions typically apply to resources, not services. We recommend the definition of a Demand Response Service be eliminated and Proxy Demand Resource be used in its place everywhere the term Demand Response Service appears. | Defined Term: Proxy Demand Resource Defined Term: Demand Response Service |
| EnergyConnect, Inc. | The definition for Proxy Demand Resource Uninstructed Deviation Amount for Energy on page 62 refers to a section 11.6.1.1 that is not included in the markup. | Defined Term: Proxy Demand Resource Uninstructed Deviation Amount for Energy |
| EnerNOC | "Proxy Demand Resource Uninstructed Deviation Amount for Energy" refers to | Defined Term: Proxy Demand |

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| | <p>Section 11.6.1.1, which is not included in this document. The section that appears to reference this topic is Section 11.23, which states that FERC has not approved CAISO's request to charge Uninstructed Deviation Penalties for Imbalance Energy, so perhaps the definition is premature.</p> | <p>Resource Uninstructed Deviation Amount for Energy</p> |
| <p>Appendix B.14 – PDR Pro Forma</p> | | |
| <p>EnergyConnect, Inc.</p> | <p>In section 3.2.1 of the Pro Forma Proxy Demand Resource Agreement, it seems a little unusual to condition a party's right to cure a default on whether it is "capable of being remedied". We suggest removing this particular condition because it appears to provide the CAISO with a unilateral and commercially unreasonable right to determine whether an event of default can be remedied.</p> <p>In general, Section 3.2 of the Pro Forma Proxy Demand Resource Agreement implies that once it signs this agreement a Demand Response Provider assumes an indefinite, open-ended financial obligation. We recommend instead that the CAISO place a commercially reasonable, bilateral time limit on any new financial obligations of no more than two years from the date of termination. This means that a Demand Response Provider's obligation to assume new payment obligations would end two years after the termination date and its right to be paid as a result of new payment obligations imposed on others would also end two years after the termination date.</p> <p>In Section 4.1 of the Pro Forma Proxy Demand Resource Agreement, we recommend the first sentence be changed to read, "...the Demand Response Provider shall provide the CAISO with all <u>relevant</u> technical and operational information <u>requires by</u> the Demand Response Application for each Proxy Demand Resource that it owns, operates or to which it has a contractual entitlement." Moreover, stakeholders have agreed that UDCs and LSEs need to be able to verify certain information provided to the CAISO by Demand Response Providers, but UDCs and LSEs should not have the ability to approve or disapprove a customer's participation in the CAISO's markets as a Proxy Demand Resource (or as part of a Proxy Demand Resource). Accordingly to the last sentence of this section should be changed to read, "The CAISO will maintain the required technical and operational information, <u>which has been verified</u> by the appropriate Load Serving Entity and Utility Distribution Company...".</p> <p>Section 4.3 of the Pro Forma Proxy Demand Resource Agreement appears to shift the burden of proof in FERC's directive regarding the role of local regulatory authorities. We would like the CAISO to explain its rationale for requiring</p> | <p>Appendix B.14 – PDR Pro Forma</p> |

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| | Demand Resource Providers to certify that they have obtained the approval of local regulatory authorities. We would also like the CAISO to explain how this apparent representation and warranty differs from the provisions of Section 8. | |
| PGE | <p>4.3 Demand Response Provider Requirements.</p> <p><i>The Demand Response Provider must register with the CAISO through the Demand Response Application and comply with all terms of the CAISO Tariff, satisfied all Proxy Demand Resource registration requirements, and certify to the CAISO that its participation is authorized by the Local Regulatory Authority applicable to Demand Response Providers and Load Serving Entities and that it has satisfied all applicable rules and regulations of the Local Regulatory Authority. The Proxy Demand Resource Registration process and certification will ensure that a registered Proxy Demand Resource has the approval of the load serving entity whose load may be part of an aggregate Proxy Demand Resource prior to participating in the wholesale markets. Since the load is served by the LSE, and the LSE will pay for Day-Ahead power that is not consumed as a result of the dispatch of the proxy demand resource, the LSE has the ability to approve or reject a proxy demand resource registration.</i></p> | Appendix B.14 – PDR Pro Forma |
| EnerNOC | We may have additional comments on this Pro Forma Agreement on the December 4 stakeholder call, but one section in particular is confusing. Section 4.3 states that the Demand Response Provider must “certify to the CAISO that its participation is authorized by the Local Regulatory Authority applicable to Demand Response Providers and that it has satisfied all applicable rules and regulations of the Local Regulatory Authority.” This seems to be a direct contradiction FERC Order 719, which places the responsibility on the Local Regulatory Authority to authorize direct participation of Demand Response Providers in CAISO wholesale markets. Please explain the rationale for this requirement. | Appendix B.14 – PDR Pro Forma |
| General and Miscellaneous Comments | | |
| AReM | Requirement for Separate Submission of Meter Data -- PDR meter data will be submitted in a completely separate process from the way meter data are currently provided to the CAISO. AReM recommends including this requirement in the tariff language because it differs from the requirements for submitting non-PDR meter data. | |

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| EnerNOC | Some of the terminology used throughout the tariff would benefit from additional clarification as it is being introduced for the first time. As noted above, some terms appear to be used interchangeable, such as “operator of PDR” and “DR Provider” and may require additional clarification. In addition, we have noted a few definitions here that seem confusing. | |
| CDWR SWP | <p>Open Ended Changes or Missing Changes</p> <p>Many sections of the proposed Tariff changes contain a bracketed comment indicating “The CAISO may propose modifications to this Section in order to implement Proxy Demand Resource.” Will the CAISO allow Market Participants sufficient time for inspection and comment for any further changes that may be produced?</p> <p>In Appendix A, Resource Location appears unmodified yet is listed in the PDR Table of Changes as being modified.</p> | |
| CDWR SWP | <p>Equal Treatment</p> <p>The additional Tariff language for Section 30.6 Bidding and Scheduling of Proxy Demand Resources, on Page 39, should be more generally defined to include Demand Response Services or products instead of only Proxy Demand Resources, especially when referring to treating Bids for Energy and Ancillary Services from such resources like Bids for Energy and Ancillary services from other types of generation resources.</p> | |
| CDWR SWP | <p>Cost Recovery</p> <p>The proposed Tariff changes are unclear as to how the CAISO will remain financially whole when paying a performing PDR at CLAP prices while only charging the underlying Demand for the PDR at DLAP prices, assuming a difference exists between these prices.</p> | |
| PG&E | The ability and extent of participation by the three Investor Owned Utilities with PDR has yet to be defined or approved by the California Public Utilities Commission (CPUC). PG&E believes that further revisions to the tariff may be required depending on the decisions of the CPUC. | |
| PG&E | There are a number of issues that are seemingly missing from either the PDR tariff or the Business Requirements Specifications (BRS). In responding to PG&E’s 11/24/09 comments on the BRS, the CAISO indicated on areas of the Registration Process, Market Power Mitigation, A/S Procurement and PDR, and Telemetry Requirements that the details were still being worked out. PG&E believes these issues need to be resolved and incorporated into the tariff or BRS. | |
| PGE | PG&E recommends the CAISO tariff should explicitly state that PDRs are not eligible Interim Capacity Procurement Method (ICPM) designations (at least until | |

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| | Resource Adequacy (RA) rules for PDR have been developed), or for use as Congestion Revenue Rights (CRR) sources within the CRR allocation process. | |
| PGE | <p>Gaming – The Draft Tariff does not include language that addresses the gaming concerns discussed in Section 4 of the CAISO’s Draft Final Proposal. In this section, the CAISO commits to creating metrics that will assist in identifying gaming behavior. PG&E recommends the CAISO include the following tariff language that reflects the design elements in Section 6.1 of the Draft Final Proposal:</p> <p><i>The CAISO will monitor certain metrics in order to identify potential gaming behavior. Should a PDR resource repeatedly fall outside of identified ranges, or fail multiple metrics, a market monitoring study would be performed to determine if there is a likelihood that the Proxy Demand Resource has been compensated for demand response that was not really provided to the market. The CAISO may ask the DRP to provide data to support proof of performance. If the CAISO concludes that the Proxy Demand Resource has been unduly compensated, the PDR resource will be removed from further participation in the CAISO markets.</i></p> | |
| PGE | <p>Incorporation of Non-Generator Participation In Ancillary Services Markets Proposal - PG&E does not believe that Appendix K incorporates the proposed changes outlined in the both the CAISO’s Draft Final Proposals for Non-Generator Participation in Ancillary Services Markets and Proxy Demand Resource. Specifically, Appendix K states:</p> <p>C 1.1. <i>The rated capacity of the Generating Unit or System Resource must be 1 MW or greater unless the Generating Unit is participating in an aggregation arrangement approved by the CAISO.</i></p> <p>However, in the Draft Final Proposal for Non-Generator Participation, the CAISO proposes that the minimum rated capacity requirement should be reduced to 500kW from the existing 1MW requirement; and in the Draft Final Proposal for PDR states the minimum rated capacity requirement is 10kW. PG&E suggests that C1.1 be changed to:</p> <p><i>The rated capacity of a Generating Unit of System Resource must be 10kW or greater unless the Generating Unit is participating in an aggregation arrangement approved by the CAISO.</i></p> <p><i>The Generating Unit must be able to increase output as soon as possible to the value indicated in a Dispatch Instruction, reaching the indicated value within ten minutes after issue of the instruction and be capable of maintaining output for 2</i></p> | |

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| | <p><i>hours.</i></p> <p>However, in the Draft Final Proposal for Non-Generator Participation, the CAISO proposes that the continuous energy requirement for spinning and non-spinning reserves should be reduced to 30 minutes from the existing 2 hour requirement. PG&E suggests that C1.2 be changed to:</p> <p>The Generating Unit must be able to increase output as soon as possible to the value indicated in a Dispatch Instruction, reaching the indicated value within ten minutes after issue of the instruction and be capable of maintaining output for 30 minutes.</p> <p>These changes are designed to synchronize the differences between these two separate initiatives.</p> | |
| PGE | <p>Section 3.3 – This section of the Draft Final Proposal states:</p> <p><i>The CLAP is a set of one or more load nodes, which is used for scheduling, pricing, and settlement with Loads. In the case of PDR resources, since the demand response is bid separately from the underlying Load and is represented by proxy generators, technically the mechanism for submitting bids uses Generation Distribution Factors (GDFs) rather than Load Distribution Factors (LDFs).(Page 9)</i></p> <p>PG&E proposes the following language to recognize the importance of utilizing GDFs versus LDFs:</p> <p>For PDR, Demand Response will be bid separately from the underlying load. The PDR will use Generation Distribution Factors for submitting bids instead of Load Distribution Factors.</p> | |
| PGE | <p>The tariff language inter-mixes the use of ‘Participating Load’ and ‘Load’ (e.g. Sections 6.3.1, 8.4.5, 8.9, 8.9.7.1, 8.9.11, 8.10.6, 11.23c, and 31.3.1.4); the uses should be clarified to be consistent and to explicitly address ‘participating load’, and ‘non-participating load’ rather than ‘load’.</p> | |