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**Comments of Northern California Power Agency
Subject: Real-Time Imbalance Energy Offset Settlement Tariff Modifications**

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Comments

The modifications provided in Section 11.5.4.2 of the Fourth Replacement CAISO Tariff, as presented in the Real-Time Imbalance Energy Offset Settlement Draft Tariff Language document published by CAISO on September 17, 2009, is consistent with the CAISO Board decision to exempt Load Following Metered Subsystems from charge code 6477. Therefore, Northern California Power Agency (NCPA) supports the modifications proposed by CAISO based on its current understanding of the revised tariff language.