

NRG Energy, Inc. Comments on the Imbalance Conformance Draft Final Proposal

Submitted By	Company	Date Submitted
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The CAISO has laid out a rational case supporting the need for operators to have the ability to “conform imbalances” (*i.e.*, adjust the balancing energy requirement as needed to account for many different issues).

The imbalance conformance limiter (*aka* “load bias limiter”), however, insulates the market from the effect of the operator’s actions.

The increasing variability of balancing energy needs and of the corresponding prices makes it even more critical that markets send proper price signals regarding the need for balancing energy.

NRG therefore strongly supports the CAISO’s efforts to timely (1) understand and address the fundamental causes underlying the need for conforming adjustments; (2) codify the need for and details regarding the working of imbalance conformance limiter in the CAISO tariff; and (3) eliminate the imbalance conformance limiter.