

NRG Energy, Inc. Comments on Commitment Cost Enhancements Phase 2 Draft Final Proposal
March 2, 2015

Submitted by	Company	Date Submitted
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NRG supports the CAISO's proposal to:

- Defer development of opportunity costs to a third phase of the Commitment Cost Enhancements stakeholder process (DFP at 18), and
- Allow for bidding of transition costs consistent with the bid caps currently established for proxy and registered cost bidding (DFP at 25).

While NRG supports the CAISO's recent move to allow daily bidding of start-up and minimum load costs up to 125% of the unit's proxy cost values, in the longer term NRG would prefer to see the CAISO move away from the current proxy/registered bidding system to a "conduct and impact" system such as those employed by the eastern ISOs. NRG understands that longer-term modifications to bidding structures will be considered within the Bidding Rules stakeholder process and looks forward to the resumption of that process.