

Powerex Corp.

Comments on Tariff Clarifications Filing

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Powerex appreciates the opportunity to provide this comment on the Tariff Clarifications Filing.

In Section 27.1.1.3 Marginal Cost of Congestion, Powerex suggests adding the clause “**within the minimum effectiveness threshold**” so that the Section reads "The Marginal Cost of Congestion at a PNode reflects a linear combination of the Shadow Prices of all binding **Transmission Constraints** in the network, each multiplied by the corresponding Power Transfer Distribution Factor (PTDF) **within the minimum effectiveness threshold**. The Marginal Cost of Congestion may be positive or negative depending on whether a power injection (i.e., incremental Load increase) at that Location marginally increases or decreases Congestion."

This addition would align the Tariff with the current change to the Market Operations BPM proposed in PRR 358.