

Summary of December 1, 2005 CAISO Amendment 72 Conference Call Questions and Answers

**As of December 2, 2005
(Updated December 29, 2005)**

Q1: If a Scheduling Coordinator (SC) has been submitting forecast and estimated actual Demand data under the letter agreement, clarify the time period for which SCs are required to submit the forecast, schedule, and estimated actual demand comparisons required by Amendment 72.

A1: SCs should submit the forecasted, scheduled, and estimated actual Demand data comparisons required by 2.2.12.3.2 for the time period of September 23, 2005 through November 27, 2005, inclusive, for any Trading Days for which they have not previously submitted Demand Forecast data and either estimated or metered actual Demand data. This data is due by December 5, 2005. Going forward, the weekly submissions required by Tariff Section 2.2.12.3.2 are due no later than 7 days after the end of each week, with the first weekly submission (for the week ending December 4, 2005) being due no later than December 11, 2005.

Q2: Can the CAISO provide an example template for the data submission?

A2: Yes, the CAISO will post an Excel template on the CAISO web site.

Q3: What is the correct address for submitting this data?

A3: scloadinfo@caiso.com

Q4: Is Participating Load subject to the Amendment 72 reporting requirements?

A4: Yes, any SC that schedules or reports Demand data to the ISO is required to submit the reports required by Amendment 72.

Q5: Does the CAISO intend to file a request for an extension of time with FERC for SCs to submit data pursuant to Amendment 72 for the period starting September 23, 2005 (this data is currently due December 5, 2005).

A5: The CAISO legal department has provided the opinion that it is more appropriate for any SC that believes a time extension is justified to make a request to FERC.

Q6: Does Amendment 72 supersede the previous letter agreement with SCs to submit Demand data?

A6: Yes, the Amendment 72 tariff modifications supersede the previous letter agreement.

Q7: Is there a Demand quantity threshold for an SC to be subject to the Amendment 72 reporting?

A7: FERC's Amendment 72 order states that there is no Demand quantity threshold.

Q8: Is there a requirement to update the forecasted, scheduled, and estimated actual Demand comparison report submitted pursuant to Tariff Section 2.2.12.3.2 after 60 days when actual meter data is available.

A8: No, the report does not have to be updated after 60 days, FERC rejected proposed Section 2.2.12.3.3.

Q9: Do the Amendment 72 requirements apply to SCs that only schedule Demand representing the auxiliary load of generating units?

A9: The CAISO legal department has provided the opinion that Amendment 72 applies to all SCs. Updated **12/29/05** – In a December 27, 2005 notice, FERC granted an extension of time to and including February 3, 2006 for generators to comply with the Amendment 72 requirements.

Q10: What are acceptable explanations for deviations from forecast or schedule that can be included in the weekly submittal?

A10: Any relevant explanation of the reason scheduled or actual Demand significantly varied from forecasted may be provided by the SC. The ISO notes that FERC currently retains all authority to determine what type of scheduling or forecasting behavior may constitute a violation of any FERC or ISO market behavioral rule.

Q11: Does the CASIO intend to make the Amendment 72 submittals public?

A11: Tariff Section 20.3.2 (added as part of Amendment 72), states the CAISO shall treat the information submitted under 2.2.12.3 as confidential information. Although the CAISO Tariff would allow the CAISO to publish the information submitted under the 2.2.12.3 in summary format, the CAISO does not currently plan to do so.

Q12: Is "behind the meter" load served entirely by self-generation of a non-SC to be reported under Amendment 72?

A12: Amendment 72 is only applicable to Demand that is scheduled and reported to the CAISO by an SC.

Q13: Is a generator with an auxiliary power agreement with the applicable Utility Distribution Company required to submit reports pursuant to Amendment 72.

A13: The SC for a generator is only required to submit reports to the extent it schedules and reports Demand to the CAISO.

Q14: What will the ISO do with the data?

A14: As indicated in the CAISO reply comments, the CAISO anticipates providing the weekly reports to FERC on a routine, ongoing basis shortly after they are received.

In addition, once actual metered data are finalized (about 45 days after each trade date), the CAISO also anticipates providing this data and/or summary of this data to FERC.

The CAISO notes that FERC currently retains all authority to determine what type of scheduling or forecasting behavior may constitute a violation of any FERC or CAISO market behavioral rule.

The reports would not constitute a referral or allegations of a violation of any FERC or CAISO market rule. In the event that the CAISO refers any specific behavior to FERC for investigation or allege a violation of any market rule, the CAISO would typically notify the participant that they are the subject of the referral for investigation or allegation.

Q15: Will the CAISO provide the applicable SC with a copy of Demand scheduling data it provides to FERC?

A15: Since weekly reports are submitted by SCs themselves, the CAISO does not anticipate providing the applicable SC with a copy of the information provided to FERC.

To the extent that the CAISO provides additional data to FERC beyond that which is submitted by SCs themselves, the CAISO will consider this question and provide a response in the future.

As noted above, in the event that the CAISO refers any specific behavior to FERC for investigation or allege a violation of any market rule, the CAISO would typically notify the participant that they are the subject of the referral for investigation or allegation.

Additional Questions – Updated 12/29/05

Q16: If an SC does not have forecasted, scheduled, or actual Demand for a particular week, is the weekly report required by 2.2.12.3.2 required for that week?

A16: The CAISO will treat an SC's decision not to file a weekly report as the equivalent of filing a weekly report showing no forecasted, scheduled, or actual Demand.

Q17: Is RMR Contract Energy scheduled to a RMR Contract Energy Load Point pursuant to Tariff Section 2.2.12.2.2, representing RMR Contract Energy that is not scheduled to forecast Demand or through Inter-Scheduling Coordinator Energy Trades, subject to the Amendment 72 requirements?

A17: Such Energy appropriately scheduled pursuant to Tariff Section 2.2.12.2.2 is not subject to the Amendment 72 requirements.

Q18: Is Demand scheduled to self-provide Transmission Losses for non-dynamically scheduled System Resources pursuant to ISO Tariff Section 7.4.1 subject to the Amendment 72 requirements?

A18: Such Demand appropriately scheduled pursuant to Tariff Section 7.4.1 is not subject to the Amendment 72 requirements.