

## Biedler, Gillian

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**From:** Bowen, Graham  
**Sent:** Friday, January 05, 2007 7:32 AM  
**To:** Biedler, Gillian  
**Cc:** Snay, Charles; Frazee, Mark; Nguyen, Kelly; Sciortino, Steven; Dehart, George; Stephens, Sue; Martinez, Jesus  
**Subject:** Comments on Proposed Modifications to Amendment 72 Requirements

The following are Anaheim's comments on the CAISO's proposed additional options for modifying the scheduling requirements established under Tariff Amendment 72 that are set forth in the December 22, 2006 Addendum to the December 11, 2006 whitepaper.

**Ability to Temporarily Reduce Day Ahead Scheduling Requirement:** In order for a temporary reduction in day ahead scheduling requirements to work, the CAISO would need to provide notice of the reduction sufficiently in advance for market participants to alter schedules accordingly.

1. **Reduced Scheduling Requirements for Off-Peak Hours:** Anaheim's preference is to limit the day ahead scheduling requirement to on-peak hours only. In fact, the requirement would only appear to be needed for the 8-hour super peak period. If an off-peak scheduling requirement is adopted, Anaheim agrees that 75% of forecasted load would be appropriate.
2. **Additional exemption for minor levels of non-compliance during all hours:** The following changes to to the 3 MWh allowance and the exclusion of the first six potential violations should be made in order to clarify the requirements.

1) Any hour in which the SC's day-ahead schedule for any UDC area was **greater than** 3 MWh lower than 95% of the SC's day-ahead load forecast for the corresponding UDC area.

1) The SC's day-ahead schedule **in an hour** was at least 93% of its day-ahead load forecast **for that hour** within the UDC area

or

2) The SC's day-ahead schedule **in an hour** was not more than 25 MWh less than 95% of its day-ahead load forecast **for that hour** within the UDC area, **whichever is greater.**

In addition, the addendum did not address our earlier comment that the CAISO should modify its systems to provide feedback to SC's regarding there schedules and load forecasts submitted in compliance with Amendment 72 so that SC's can verify that the CAISO has received the correct information. SCs should be allowed to not only review the data shown in the CAISO scheduling system but also be allowed to make changes to correct any errors.

We have also joined in and generally support the joint comments of Coral Power, Sempra Energy Solutions and Strategic Energy on the Addendum with the exception of the recommendation to immediately implement convergence bidding. On that issue, we do not take a position at this time.

Mark A. Frazee  
Principal Integrated Resources Planner  
Anaheim Public Utilities Department  
201 S. Anaheim Blvd., Suite 802  
Anaheim, California 92805

(714) 765-4131  
[mfraze@anaheim.net](mailto:mfraze@anaheim.net)