

Comments of Calpine Corp. on Aliso Canyon Gas Electric Coordination Draft Tariff Language

Matthew Barmack
Director of Market & Regulatory Analysis
Calpine Corp.
925-557-2267
barmackm@calpine.com

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Calpine has the following concerns and questions about the draft tariff language:

Generally, which provisions are intended to sunset, only provisions with explicit sunset dates, such as 39.7.1.1.1.3(c). Will the Natural Gas Constraint in 27.11 sunset as well?

Please confirm that the opportunity to re-bid commitment costs in 30.5.1(b) and the cost recovery provisions in 30.11 are not limited to resources receiving gas service from Southern California Gas Company and San Diego Gas and Electric Company and that 30.5.1(b) will not sunset.

In 39.7.1.1.1.3(c), please explain the justification for using different percentage increases in the gas prices that will be used to cap commitment costs, on the one hand, and energy bids, on the other hand. Why not use the same percentage premium for both?

In addition, please clarify the following sentence “Upon determining that an adjustment in the gas price is necessary, the CAISO will issue a Market Notice specifying the amount of the adjustment.” Does this imply that the initial gas price index premia of 25% and 75% will be implemented at the discretion of the CAISO, for example, only on specific days, or does this sentence refer to increases above the 25% and 75% initial levels?