

[Comments from Brian Theaker, NRG Energy, Inc.](#)

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6.2.1.3 Individually Assigned Login Accounts

The CAISO will provide an interface for data exchange between the CAISO and Scheduling Coordinators who shall each have individually assigned login accounts via digital certificates. Through the use of the security provisions of CAISO's secure communication system, data will be provided by the CAISO to Scheduling Coordinators on a confidential basis (such as Day-Ahead Schedules [and resource-specific pricing data resulting from the enforcement of a natural gas constraint as specified in Section 27.11](#) for individual Scheduling Coordinators). Other CAISO data that is not confidential (such as CAISO Demand Forecasts) will be published on the public access reporting system of the CAISO Website and be available to anyone.

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6.5.2.2.2 Day-Ahead Market Bid Submittal

Seven (7) days prior to any Trading Day, Scheduling Coordinators can begin submitting Bids for the DAM for that Trading Day.

6.5.2.2.3 Advisory Day-Ahead Market Results

[The CAISO may provide to the responsible Scheduling Coordinator the MWh amounts scheduled in the preliminary RUC process the CAISO conducts two \(2\) days prior to the Trading Day, that is based on Bids and forecasts of system conditions as available in the CAISO Market systems at the time the CAISO conducts the preliminary RUC process. This information is for advisory purposes only and is not financially binding.](#)

6.5.2.3.4 ~~Natural Gas and~~ Greenhouse Gas Price Indices

The CAISO will publish ~~relevant natural gas price indices and~~ [daily](#) greenhouse gas price indices when available.

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6.5.4.2.3 The CAISO will publish the natural gas price used for the Real-Time Market when available.

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7.9.2 Reasons for Suspension or Limitation

The CAISO may suspend or limit the ability of one or more Scheduling Coordinators to submit Virtual Bids if the CAISO determines that virtual bidding activities of one or more Scheduling Coordinators on behalf of one or more Convergence Bidding Entities detrimentally affect System Reliability or grid operations.

Virtual bidding activities can detrimentally affect System Reliability or grid operations if such activities contribute to threatened or imminent reliability conditions, including but not limited to the following circumstances:

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- (a) Submitted Virtual Bids create a substantial risk that the CAISO will be unable to obtain sufficient Energy and Ancillary Services to meet Real-Time Demand and Ancillary Service requirements in the CAISO Balancing Authority Area.
- (b) Submitted Virtual Bids render the CAISO Day-Ahead Market software unable to process Bids submitted into the Day-Ahead Market.
- (c) Submitted Virtual Bids render the CAISO unable to achieve an alternating current (AC) solution in the Day-Ahead Market for an extended period of time.
- (d) Submitted Virtual Bids detrimentally affect CAISO market efficiency related to enforcement of a natural gas constraint pursuant to Section 27.11.

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27.11 Natural Gas Constraint

The CAISO may enforce constraints that limit the maximum amount of natural gas that can be burned by natural gas-fired resources in the Southern California Gas Company and San Diego Gas & Electric Company gas regions, based on limitations in applicable gas regions anticipated by the CAISO during specific hours. In the event that such a constraint is binding, the Shadow Price of the constraint will only

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be reflected in the Marginal Cost of Congestion component of the Locational Marginal Prices of the affected natural gas-fired resources. The Shadow Price of the constraint will not be reflected in the Marginal Cost of Congestion component of the Locational Marginal Prices for purposes of settling cleared Demand, Virtual Bids, or Congestion Revenue Rights. The same Marginal Cost of Congestion used for settling Demand, Virtual Bids, or Congestion Revenue Rights is used for the calculation of the Real-Time Congestion Offset pursuant Section 11.5.4.1.1. The CAISO will allocate any non-zero amounts that are attributable to the price differential between the Marginal Cost of Congestion used for settling a Generating Unit's scheduled or Dispatched amounts at their location and the Marginal Cost of Congestion used for settling Demand, Virtual Bids, or Congestion Revenue Rights pursuant to Section 11.5.4, except that for Day-Ahead settlements the CAISO will allocate the difference through the CRR Balancing Account pursuant to Section 11.2.4.5. The CAISO will provide, through the procedures set forth in Section 6.5.10.1.1, information on whether the CAISO plans to enforce a natural gas constraint in the Day-Ahead Market, and after the Day-Ahead Market is executed, whether it enforced a natural gas constraint in the Day-Ahead Market. In addition, to the extent feasible in advance of the deadline for submitting Bids for the Day-Ahead or Real-Time Market, as applicable, the CAISO will issue a notice through its market notification system indicating its intent to enforce a natural gas constraint along with the affected areas and the magnitude and expected duration of the natural gas constraint.

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30.4.1.2 Registered Cost Methodology

(a) — Under the Registered Cost methodology, the Scheduling Coordinator for a Use-Limited Resource may register values of its choosing for Start-Up Costs and/or Minimum Load Costs in the Master File subject to the maximum limit specified in Section 39.6.1.6. A Scheduling Coordinator for a Multi-Stage Generating Resource that is a Use-Limited Resource registering a Start-Up Cost must also register Transition Costs for each feasible MSG Transition, subject to the maximum limit specified in Section 39.6.1.7. For a Use-Limited Resource to be eligible for the Registered Cost methodology there must be sufficient information in the Master File to calculate the value pursuant to the Proxy Cost methodology, which will be used to validate the specific value registered using the Registered Cost methodology. Any

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such values will be fixed for a minimum of 30 days in the Master File unless: (a) the resource's costs for any such value, as calculated pursuant to the Proxy Cost methodology, exceed the value registered using the Registered Cost methodology, in which case the Scheduling Coordinator may elect to switch to the Proxy Cost methodology for the balance of any 30-day period, except as set forth in Section 30.4.1.2(b); or (b) any cost registered in the Master File exceeds the maximum limit specified in Section 39.6.1.6 or Section 39.6.1.7 after this minimum 30-day period, in which case the value will be lowered to the maximum limit specified in Section 39.6.1.6 or Section 39.6.1.7. If a Multi-Stage Generating Resource elects to use the Registered Cost methodology, that election will apply to all the MSG Configurations for that resource. The cap for the Registered Cost values for each MSG Configuration will be based on the Proxy Cost values calculated for each MSG Configuration, including for each MSG Configuration that cannot be directly started, which are also subject to the maximum limits specified in Sections 39.6.1.6 and 39.6.1.7.

~~(b) — If the alternative natural gas price set forth in Section 39.7.1.1.1.3(b) is triggered, and a Use-Limited Resource's Start-Up Costs or Minimum Load Costs calculated pursuant to the Proxy Cost methodology using the alternative gas price exceeds the value registered in the Master File, then the CAISO will switch the Use-Limited Resource to the Proxy Cost methodology. Any Use-Limited Resource switched to the Proxy Cost methodology pursuant to this Section 30.4.1.2(b) will revert to the Registered Cost methodology when the Use-Limited Resource's alternative Proxy Cost calculation no longer exceeds the value registered using the Registered Cost methodology. These determinations will be made separately for both Start-Up Costs and Minimum Load Costs. The CAISO will not make a separate determination for Transition Costs but if a Start-Up Cost is switched to the Proxy Cost methodology, the Transition Costs of the Use-Limited Resource will also be switched to the Proxy Cost methodology.~~

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30.5.1 General Bidding Rules

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(b) Bid prices submitted by a Scheduling Coordinator for Energy accepted and

cleared in the IFM and scheduled in the Day-Ahead Schedule may be increased or decreased in the RTM . Bid prices for Energy submitted but not scheduled in the Day-Ahead Schedule may be increased or decreased in the RTM.

Incremental Bid prices for Energy associated with Day-Ahead AS or RUC Awards in Bids submitted to the RTM may be revised. [A Scheduling Coordinator may submit in the Real-Time Market new daily Bids for Start-Up Costs, Minimum Load Costs, and Transition Costs for resources and MSG Configurations for which the Scheduling Coordinator previously submitted such Bids in the Day-Ahead Market, except for: \(1\) Trading Hours in which a resource or MSG Configuration has received a Day-Ahead Schedule or has received a Start-Up Instruction in RUC; and \(2\) Trading Hours that span the Minimum Run Time of the resource or MSG Configuration after the CAISO has committed the resource or the Scheduling Coordinator has self-committed the resource in the RTM.](#)

Scheduling Coordinators may revise ETC Self-Schedules for Supply in the RTM to the extent such a change is consistent with TRTC Instructions provided to the CAISO by the Participating TO in accordance with Section 16. Scheduling Coordinators may revise TOR Self-Schedules for Supply only in the HASP to the extent such a change is consistent with TRTC Instructions provided to the CAISO by the Non-Participating TO in accordance with Section 17. Energy associated with awarded Ancillary Services capacity cannot be offered in the Real-Time Market separate and apart from the awarded Ancillary Services capacity;

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30.11 Filings with FERC to Recover Actual Marginal Fuel Procurement Costs

If a **Scheduling** Coordinator (including an EIM Participating Resource Scheduling Coordinator) incurs but cannot recover through the Bid Cost Recovery process any actual **marginal** fuel procurement costs that exceed (i) the limit on Bids for Start-Up Costs set forth in Section 30.7.9, (ii) the limit on Bids for Minimum

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Load Costs set forth in Section 30.7.10, or (iii) the limit on Bids for Transition Costs set forth in Section 30.4.1.1.5, (iv) the incremental fuel cost calculated under the Variable Cost Option for Default Energy Bids as set forth in Section 39.7.1.1.1, or (v) the incremental fuel cost calculated for Generated Bids as set forth in Sections 30.7.3.4, 39.7.1.1.1, and 40.6.8, the Scheduling Coordinator for the resource may seek to recover those costs through a FERC filing made pursuant to Section 205 of the Federal Power Act. The Scheduling Coordinator must notify the CAISO within thirty (30) Business Days after the Operating Day on which the resource incurred the unrecovered costs, and must submit the filing to FERC within ninety (90) Business Days after that **Operating Trading** Day. Within sixty (60) Business Days after the **Operating Trading** Day for which the Scheduling Coordinator provides notice to the CAISO per this Section, the CAISO will provide the Scheduling Coordinator with a written explanation of any effect that events or circumstances in the CAISO Markets and fuel market conditions may have had on the resource's inability to recover the costs on the Trading Day.

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Each filing the Scheduling Coordinator submits to FERC must include:

- (1) (1) Data supporting the Scheduling Coordinator's claim to the unrecovered costs it seeks, including invoices for the unrecovered costs
- (1) Data supporting the Scheduling Coordinator's claim to the unrecovered costs it seeks, including Invoices for the unrecovered costs
- (2) A description of the resource's participation in any gas pooling arrangements;
- (3) An explanation of why recovery of the costs is justified; and
- (4) A copy of the written explanation from the CAISO to the Scheduling Coordinator described above in this Section.

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To the extent that FERC authorizes the Scheduling Coordinator to recover any costs pursuant to the Scheduling Coordinator's filing, the CAISO will pay the Scheduling Coordinator any amounts the Commission deems recoverable and will allocate such amounts pursuant to Section 11.14.

The CAISO may at its sole discretion implement any temporary variation or waiver of the timing requirements of this Section 31 and Section 6.5.3 (including the omission of any step) if any of the following criteria are met:

- (i) such waiver or variation of timing requirements is reasonably necessary to preserve System Reliability, prevent an imminent or threatened System Emergency or to retain Operational Control over the CAISO Controlled Grid during an actual System Emergency.
- (ii) because of error or delay, the CAISO requires additional time to fulfill its responsibilities;
- (iii) problems with data or the processing of data cause a delay in receiving or issuing Bids or publishing information on the CAISO's secure communication system;
- (iv) problems with telecommunications or computing infrastructure cause a delay in receiving or issuing Day-Ahead Schedules or publishing information on the CAISO's secure communication system;
- (v) ~~the alternative natural gas price set forth in Section 39.7.1.1.1.3(b) is triggered.~~

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34.6 Short-Term Unit Commitment

Once per hour, near the top of each Trading Hour, immediately after the FMM and the RTUC for the same interval is completed the CAISO performs an approximately five (5) hour Short-Term Unit Commitment (STUC) run using SCUC and the CAISO Forecast Of CAISO Demand to commit Medium Start Units and Short Start Units with Start-Up Times greater than the time period covered by the RTUC described in Section 34.3. In any given Trading Hour, the STUC may commit resources for the third fifteen-minute interval of the current Trading Hour and extending into the next four (4) Trading Hours. The STUC looks ahead over a period of at least three (3) hours beyond the Trading Hour for which the RTUC optimization was run. ~~STUC, and~~ will utilize: (1) Bids previously submitted in the RTM by the Scheduling Coordinator for that Trading Hour; or (2) the Clean Bid from the Day-Ahead Market if the resources has a Day-Ahead Schedule or received a Start-Up Instruction in RUC for the Trading Hour, or if

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~~the resource has a Real-Time must-offer obligation for that Trading Hour available from other CAISO Markets for that Trading Hour for these additional hours.~~ The CAISO revises these replicated Bids each time the hourly STUC is run, to utilize the most recently available Bids. Not all resources identified for need as a given STUC run will necessarily receive CAISO commitment instructions immediately, because during the Trading Day the CAISO may issue a commitment instruction to a resource only at the latest possible time that allows the resource to be ready to provide Energy when it is expected to be needed. A Start-Up Instruction produced by STUC is considered binding if the resource could not achieve the target Start-Up Time as determined in the current STUC run in a subsequent RTUC or STUC run as a result of the Start-Up Time of the resource. A Start-Up Instruction produced by STUC is considered advisory if it is not binding, such that the resource could achieve its target start time as determined in the current RTUC run in a subsequent STUC or RTUC run based on its Start-Up Time. A binding Dispatch Instruction produced by STUC that results in a change in Commitment Status will be issued, in accordance with Section 6.3, after review and acceptance of the Start-Up Instruction by the CAISO Operator. The STUC will only decommit a resource to the extent that resource's physical characteristics allow it to be cycled in the same approximately five (5) hour look-ahead time period for which it was previously committed. STUC does not produce Locational Marginal Prices for Settlement. A Day-Ahead Schedule or RUC Schedule for an MSG Configuration that is later impacted by the resource's derate or outages, will be reconsidered in the STUC process taking into consideration the impacts of the derate or outage on the available MSG Configurations.

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39.7.1.1.1.3 Calculation of Natural Gas Price

- (a) ~~Except as set forth in Section 39.7.1.1.1.3(b),~~ the CAISO will use different gas price indices for the Day-Ahead Market and the Real-Time Market ~~and a gas price index will be calculated using at least two prices from two or more of the following publications: Natural Gas Intelligence, SNL Energy/BTU's Daily Gas Wire, Platt's Gas Daily, and the Intercontinental Exchange.~~ If a gas

price index is unavailable for any reason, the CAISO will use the most recently available gas price index as set forth in Section 39.7.1.1.1.3(c).

(b) For the Day-Ahead Market, the CAISO will use a gas price index reported by the Intercontinental Exchange between 8:00 and 9:00 a.m. Pacific Time, which is a volume-weighted average price calculated by the Intercontinental Exchange based on trades transacted on the Intercontinental Exchange during its next-day trading window. will update the gas price indices between 19:00 and 22:00 Pacific Time using natural gas prices published on the day that is two (2) days prior to the applicable Trading Day, unless gas prices are not published on that day, in which case the CAISO will use the most recently published prices that are available.

(c) For the Real-Time Market, the CAISO will calculate a gas price index using at least two prices from two or more of the following publications: Natural Gas Intelligence, SNL Energy/BTU's Daily Gas Wire, Platt's Gas Daily, and the Intercontinental Exchange. The CAISO will update gas price indices for the Real-Time Market between the hours of 19:00 and 22:00 Pacific Time using natural gas prices published one (1) day prior to the applicable Trading Day, unless gas prices are not published on that day, in which case the CAISO will use the most recently published prices that are available.

(d) For the Real-Time Market, the CAISO will increase the gas price calculated pursuant to Section 39.7.1.1.1.3(c) for resources receiving gas service from Southern California Gas Company and San Diego Gas & Electric Company by an amount that: (1) improves the dispatch of these resources so that they are more likely to be dispatched to address local needs rather than system needs; (2) better accounts for systematic differences between day-ahead and same-day natural gas prices; and (3) improves the ability to manage the generators' gas usage within applicable gas balancing rules. For applicable resources, the CAISO will initially increase the gas commodity price used in the calculation of Start-Up Costs, Minimum Load Costs, and Transition Costs pursuant to Section 30.4.1.1, and Generated Bids pursuant to Section 40.6.8, by seventy-five (75) percent, and may decrease this amount or increase it further by an amount not to exceed \$2.50/therm plus two (2) times the next-day gas index price calculated pursuant to

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Section 39.7.1.1.1.3(b). For applicable resources, the CAISO will initially increase the gas commodity price used in the calculation of Default Energy Bids pursuant to Section 39.7.1.1 by twenty-five (25) percent, and may decrease this amount or increase it further by an amount not to exceed one hundred (100) percent. Upon determining that a subsequent increase in the gas price is necessary after the initial increase, the CAISO will issue a Market Notice specifying the amount of the increase.

(b) If a daily gas price reported by the Intercontinental Exchange on the morning of the Day-Ahead Market run exceeds one hundred twenty-five (125) percent of any natural gas price index calculated for the Day-Ahead Market between 19:00 and 22:00 Pacific Time on the preceding day, the CAISO will utilize the gas price reported by the Intercontinental Exchange in all CAISO cost formulas and market processes for that day's Day Ahead Market that would normally utilize the natural gas price index calculated pursuant to this Section 39.7.1.1.1.3.

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39.7.1.1.3 Filings with FERC to Recover Actual Marginal Fuel Procurement Costs

A Scheduling Coordinator for a resource subject to the Variable Cost Option may seek to recover actual marginal fuel procurement costs pursuant to a filing with FERC in accordance with Section 30.11.

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39.7.2.2 Criteria

(A) Notwithstanding the provisions in Section 39.7.2.2(B), when the CAISO enforces the natural gas constraint pursuant to Section 27.11, the CAISO may deem selected internal constraints to be non-competitive for specific days or hours based on its determination that actual electric supply conditions may be non-competitive due to anticipated electric supply conditions in the Southern California Gas Company and San Diego Gas & Electric Company gas regions.

(B) Subject to Section 39.7.3, for the DAM and RTM, a Transmission Constraint will be non-competitive only if the Transmission Constraint fails the dynamic competitive path assessment pursuant to this Section 39.7.2.2.

(a) Transmission Constraints for the DAM - As part of the MPM process associated with the DAM, the CAISO will designate a Transmission Constraint for the DAM as non-competitive when the fringe supply of counter-flow to the Transmission Constraint from all portfolios of suppliers that are not identified as potentially pivotal is less than the demand for counter-flow to the Transmission Constraint. For purposes of determining whether to designate a Transmission Constraint as non-competitive pursuant to this Section 39.7.2.2(a):

- (i) Counter-flow to the Transmission Constraint means the delivery of Power from a resource to the system load distributed reference bus. If counter-flow to the Transmission Constraint is in the direction opposite to the market flow of Power to the Transmission Constraint, the counter-flow to the Transmission Constraint is calculated as the shift factor multiplied by the resource's scheduled Power. Otherwise, counter-flow to the Transmission Constraint is zero.
- (ii) Fringe supply of counter-flow to the Transmission Constraint means all available capacity from internal resources not controlled by the identified potentially pivotal suppliers and all internal Virtual Supply Awards not controlled by the identified potentially pivotal suppliers that provide counter-flow to the Transmission Constraint. Available capacity reflects the highest capacity of a resource's Energy Bid adjusted for Self-Provided Ancillary Services and derates.
- (iii) Demand for counter-flow to the Transmission Constraint means all internal dispatched Supply and Virtual Supply Awards that provide counter-flow to the Transmission Constraint.
- (iv) Potentially pivotal suppliers mean the three (3) portfolios of net sellers that control the largest quantity of counter-flow supply to the Transmission Constraint.
- (v) Portfolio means the effective available internal generation capacity under the control of the Scheduling Coordinator and/or Affiliate determined pursuant to Section 4.5.1.1.12 and all effective internal Virtual Supply Awards of the Scheduling Coordinator and/or Affiliate. Effectiveness in supplying counter-flow

is determined by scaling generation capacity and/or Virtual Supply Awards by the shift factor from that location to the Transmission Constraint being tested.

- (vi) A portfolio of a net seller means any portfolio that is not a portfolio of a net buyer. A portfolio of a net buyer means a portfolio for which the average daily net value of Measured Demand minus Supply over a twelve (12) month period is positive. The average daily net value is determined for each portfolio by subtracting, for each Trading Day, Supply from Measured Demand and then averaging the daily value for all Trading Days over the twelve (12) month period. The CAISO will calculate whether portfolios are portfolios of net buyers in the third month of each calendar quarter and the calculations will go into effect at the start of the next calendar quarter. The twelve (12) month period used in this calculation will be the most recent twelve (12) month period for which data is available. The specific mathematical formula used to perform this calculation will be set forth in a Business Practice Manual. Market Participants without physical resources will be deemed to be net sellers for purposes of this Section 39.7.2.2(a)(vi).
- (vii) In determining which Scheduling Coordinators and/or Affiliates control the resources in the three (3) identified portfolios, the CAISO will include resources and Virtual Supply Awards directly associated with all Scheduling Coordinator ID Codes associated with the Scheduling Coordinators and/or Affiliates, as well as all resources that the Scheduling Coordinators and/or Affiliates control pursuant to Resource Control Agreements registered with the CAISO as set forth Section 4.5.1.1.13. Resources identified pursuant to Resource Control Agreements will only be assigned to the portfolio of the Scheduling Coordinator that has control of the resource or whose Affiliate has control of the resource pursuant to the Resource Control Agreements.

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40.6.3 Additional Availability Requirements For Resources that Are Not Long Start Units or Extremely Long Start Resources

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A ~~resource that is not a Long Start Unit or Extremely Long Start Resource~~ ~~Short Start Unit~~ that is a Resource Adequacy Resource and that does not have an IFM Schedule or a RUC Schedule for any of its capacity for a given Trading Hour is required to participate in the Real Time Market in accordance with Section 40.6.2. Such a resource that is also a Use-Limited Resource subject to Section 40.6.4 is required, consistent with their applicable use plan, to submit Economic Bids or Self Schedules for Resource Adequacy Capacity into the Real Time Market.

The CAISO may waive these availability obligations for a ~~resource that is not a Long Start~~ **Unit** or an ~~Extremely Long Start Resource~~ ~~Short Start Unit~~ that does not have an IFM Schedule or a RUC Schedule based on the procedure to be published on the CAISO Website.

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40.6.8.1.6 Filings with FERC to Recover Actual Marginal Fuel Procurement Costs

A Scheduling Coordinator for a resource subject to a Generated Bid may seek to recover actual marginal fuel procurement costs pursuant to a filing with FERC in accordance with Section 30.11.

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