

Xcel Energy Comments on CAISO Proposed Tariff Framework

Xcel Energy appreciates the opportunity to provide input on the proposed tariff design. As proposed, the tariff structure appears reasonable and provides for the needed tariff requirements. By including the EIM tariff language within the existing CAISO tariff, the CAISO reduces the potential for conflicting tariff language in the future. For this reason, Xcel Energy supports moving forward with this framework.

Xcel Energy is not offering comments on the specific words in this document, as it appears that the CAISO copied most of the language a previous version of the straw proposal. The CAISO modified several sections of the white paper and the CAISO must incorporate these modifications and appropriate language based on the final EIM design. Final tariff language must balance the level of detail in the EIM tariff with the details in EIM Entities tariffs and EIM market protocols. Additionally, the CAISO must ensure that the tariff language clearly separates the processes that cover EIM participants as compared to those that cover the CAISO participants.