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Sent: Friday, September 1, 2023 2:04 PM
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Subject: Follow Up on Response to Public Comments, Buy-Through Program

Thank you for the information. In reviewing the responses, we have a few questions we would like clarification on specific to the imbalance charged proposed in the buy through program:

- If a GSP is serving more than one customer, must the GSP provide unique load forecasts for each individual customer, or can a load forecast that aggregates all customer accounts be provided to SRP?
- If a GSP is serving more than one customer, must the GSP provide unique energy supply schedules for each individual customer, or can a GSP provide SRP with one energy supply schedule that aggregates all energy supply into one schedule?
  - GSPs typically buy and schedule energy for all customers at a delivery point, and do not perform separate transactions for each individual customer. For this reason, it is preferred that GSPs can provide one aggregated energy supply schedule. However, it is understood that SRP plans to bill customers, not GSPs, for imbalance between forecasted load and delivered energy, implying that unique energy supply schedules for each individual customer may be necessary. If this is the case, NRG is attempting to determine how to best provide individual customer energy schedules when energy will be purchased in aggregate for multiple customers.
  - Due to the challenges outlined above, this is the reason that NRG brought up the concern in our original letter regarding the definition of "imbalance". There could be "imbalance" both 1) between a customer's forecasted load and actual load and 2) between a GSP's scheduled energy and actual energy delivery. Charging customers imbalance for item 1) would be fairly easy if a GSP provides unique customer forecasts, and it would mitigate the concerns outlined by SRP of a customer trying to game the system by intentionally misforecasting their load. Differences between a GSP's scheduled and actual energy supply outlined by item 2) will be much more difficult to associate with individual customers as GSPs schedule for all customers, and NRG continues to believe should be handled solely by LDs charged to GSPs. Is SRP open to this type of approach for how "imbalances" defined by 1) and 2) are addressed?

Thank you,

Scott

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