

RMP Data Request 1.1:

Randall J. Falkenberg Direct Testimony. As lines 827 through 829 (pages 34 – 35) of Mr. Falkenberg's direct testimony relate to the Dynamic Overlay, please provide any documentation or other support for the statement that "In actual practice there are far more deliveries of reserves from PACE to PACW than the reverse situation."

OCS Response to RMP Data Request 1.1:

Review of the Company's response in OCS 21.1 (Attachment WIEC 21.24) indicates the reverse situation is, in fact, more accurate. However, reserve transfers from PACE to PACW do occur and should still be considered in the GRID modeling. Mr. Falkenberg will clarify the record on this issue in a subsequent round of testimony. Mr. Falkenberg also suspects that part of the reason why the modeling used for Dynamic Overlay adjustment shows more PACE to PACW reserve transfers than normal operation is that the underlying reserve requirements used in GRID are greatly overstated relative to actual operation. The final GRID run would eliminate any such overlaps.