

**Comments of the Sacramento Municipal Utility District to the California
Independent System Operator Corporation's Draft MRTU Readiness Certification
Plan**

November 30, 2007

The Sacramento Municipal Utility District (SMUD) hereby submits the following brief comments to the California Independent System Operator Corporation's (CAISO) Draft MRTU Readiness Certification Plan (Draft Plan) dated November 20, 2007.

SMUD clearly appreciates the fact that the CAISO is making this Draft Plan available for stakeholder comment. That noted, the Draft Plan is far too general. Specifically, it would be more useful to SMUD if the CAISO elaborated in more detail as to some of the elements in its "60-Day Readiness Certification." For example, the last bullet of point 9, "Market Participant readiness statements by Key Participants" begs many questions. Who are the so-called "Key Participants"? How are they to be chosen, or, have they already been selected? Are they, or will they be, a sufficient representation of Market Participants, including interconnected control areas? What is the weighting given should some or any one of these Key Participants express concerns? None of this has been summarized or explained.

Additionally, it appears from the context (i.e., under the heading "60-Day Readiness Certification") that these Key Participants will provide a statement two months before the actual go-live date. Although SMUD does not object to this, it certainly believes that there should be a final statement immediately preceding the MRTU go-live date of April 1, 2008. Indeed, many things can change during a 60-day period and any readiness statement should reflect actual readiness which will occur closer to the eve of the cut over. Perhaps this is intended by the CAISO; however, it is certainly not clear from the Draft Plan. This concern is reinforced by the timeline included in the Draft Plan which does not appear to solicit comments from stakeholders beyond November 30th.

Again, SMUD appreciates the CAISO's efforts, however, it hopes that more details will be forthcoming and another opportunity for comments will be provided.