Comments on Transmission Reliability Margin Issue Paper and Straw Proposal

| Submitted By | Company or Entity | Date Submitted |
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Powerex appreciates the opportunity to provide these brief comments on the Transmission Reliability Margin ("TRM") Issue Paper and Straw Proposal ("Issue Paper") published on December 21, 2011. Powerex supports the CAISO's efforts in refining its operational practices, providing greater clarity in the management of transmission constraints in the real-time markets, and seeking the tariff authority from FERC.

Powerex supports the CAISO's proposal to limit the reasons for using TRM to unscheduled flow, uncertainty of transmission system availability, and simultaneous interaction between different paths. Powerex also strongly supports the proposal to limit the use of TRM to the current day, no earlier than 2 hours in advance of dispatch.