

**California Department of Water Resources State Water Project's
Comment to the California Independent System Operator
Catalog of Market Design Initiatives**

August 1, 2011

California Department of Water Resources State Water Project (SWP) appreciates CAISO's continued openness to refine the RMR Pump Load initiative (Item 2.10), introduced in December 2010. SWP believes this initiative is a key element for improving market participation of pump load resources while, at the same time, improving service to pump load resources having unique regulatory and environmental operating restrictions. In light of recent communication with the CAISO regarding this initiative, SWP believes that the status of this initiative be changed from suspended to "In Progress" as SWP and the CAISO continues to address refinements to this initiative.