

March 29, 2012

**COMMENTS ON BEHALF OF THE CITIES OF ANAHEIM, AZUSA, BANNING,
COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA REGARDING THE STRAW
PROPOSAL FOR FLEXIBLE RAMPING PRODUCT COST ALLOCATION**

In response to the ISO's request, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the "Six Cities") submit the following comments on the ISO's March 15, 2012 Flexible Ramping Product Cost Allocation Straw Proposal ("the Straw Proposal").

Based on review of the Straw Proposal, the Six Cities support the proposed method for allocating the costs that result from the ISO's procurement of Flexible Ramping Product. The cost allocation methodology outlined in the Straw Proposal appears to be consistent with the Cost Allocation Guiding Principles.

Submitted by

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