COMMENTS OF STRATEGIC ENERGY, L.L.C. AND SEMPRA ENERGY SOLUTIONS LLC ON

SEPTEMBER 14, 2007 PROPOSAL FOR MARKET RELEASE 1A

Strategic Energy and Sempra Energy Solutions strongly support the CAISO's decision to

move Dispatchable Demand Response (Roadmap Section 2.2.5) to Release 1A. The

CAISO must move forward quickly in implementing price-responsive demand in MRTU.

The California Public Utilities Commission has authorized billions of dollars for

deployment of advanced metering for retail consumers. These expenditures will fail to

provide the expected results in peak-demand reduction without the clear ability for retail

customers to respond to price signals in the wholesale market. Essentially, retail

customers who bid in price-responsive demand are choosing their own desired level of

reliability, which increases overall market efficiencies and mitigates supplier market

power. Mitigation of supplier market power is particularly important, considering that a

form of scarcity pricing will be implemented in Release 1A. For these reasons, Strategic

Energy and Sempra Energy Solutions urge the CAISO to adopt its current proposal to

include Dispatchable Demand Response in Release 1A.

Submitted:

September 24, 2007