

**Stakeholder Process: Market Initiatives Release Plan**

**Summary of Submitted Comments**

**Stakeholders submitted one round of written comments to the CAISO on the following dates:**

- Round One, 7/17/09

Stakeholder comments are posted at: <http://www.aiso.com/23ad/23ade49d4790.html>

**Other stakeholder efforts include:**

- 2009-2011 Release Planning Workshop, 6/24/09
- Implementation Workshop, 8/19/09

| Calpine  | PG&E  | JP Morgan   | EPIC   | WPTF  | CPUC   | PCI  | CDWR  | Mirant      | Management Response  |
|--|---|---|--|---|--|--|---|-------------|--|
| Conditional; Supports Multi-Stage Generator Modeling schedule but disappointed with delay in Convergence Bidding | Conditional; insufficient detail and may not be practical to implement.   | Conditional; premature to estimate release plan until market design is complete                   | Opposes; not logical to have other items precede convergence bidding; lack of stakeholder process              | No comments   | No comments  | Conditional; Need interface specifications 2-3 months prior to market simulation | Conditional; some initiatives have incomplete stakeholder processes making it difficult to budget or plan | No comments | The release plan will be further detailed to show dependencies and all external facing milestones. |
| No comments  | Conditional; Schedules are too optimistic/ aggressive. Requests regular check points and cost/benefit evaluation.                               | Conditional; Recommends schedules clearly identify dependencies                                   | Opposes; ISO should adopt full stakeholder process that allows open discussion and transparent decision making | Opposes; need better coordination and integration between roadmap and release plan; Release plan have undone results of roadmap process | Conditional; Recommends cautious and measured approach                           | Conditional; prefer early communication even if not perfect rather than waiting  | Conditional; request better transparency on delays  | No comments | The ISO will continue to evolve their business processes as a result of lessons learned.           |
| No comments  | Conditional; Need change management control; internal plans for discretionary should be included; linkages between initiatives need to be added | Opposes; priority items have been deferred and process needs to be combined with release planning | No comments  | Opposes; implementation constraints must be transparent   | Conditional; should be explicitly coordinated with renewable integration program | No comments  | Supports; process is fair   | No comments | The Market Initiatives Roadmap and Release Plan will be further coordinated.                       |
| No comments  | Opposes; proposed changes are not proven to enhance market performance; Technical No comments analysis and release plan is required             | Conditional; Require more information to determine impacts  | No comments  | No comments   | Supports; encourages continued stakeholder process on these improvements         | No comments  | Support; low impacts  | No comments | The ISO will provide further information on these improvements                                     |

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|-------------|--|--|-------------|-------------|---|--|---|-------------|---|
| No comments | Conditional; Requests one on one technical meetings and better information sharing.  | No comments  | No comments | No comments | No comments   | Conditional; require access and details prior to market simulation           | Conditional; request single page timeline or matrix                                 | No comments | The ISO is committed to supporting the external communication forums                                |
| No comments | No comments  | No comments  | No comments | No comments | Conditional; the role of RUC payments should be revisited   | Conditional; post technical details in advance                               | More information needed to gauge impacts  | No comments |   |
| No comments | Opposes; release plan not clear, prefer consolidated not staggered releases.   | Conditional; allow sufficient time for testing; Other market initiatives need to be considered | No comments | No comments | Conditional; concerned that enhancements will over burden already taxed system  | No comments  | Supports; low impact  | No comments | The Post Summer Release is progressing and information is provided through the SIUG forum.          |
| No comments | Conditional; implementation may cause burden on settlements functions during transition                                      | Supports; prepared and on course for implementation  | No comments | No comments | Conditional; concerned about true-up of CRR balances and retroactive price corrections  | No comments  | Supports; ready for deployment  | No comments | Payment Acceleration is on track for deployment on 11/1/2009/                                       |
| No comments | Conditional; medium to high impacts will require more time and resources than allocated timeframe                            | Conditional; allow sufficient time for testing   | No comments | No comments | Conditional; encourages coordination of SLIC query  | Conditional; will need SIBR interface specs in August to meet December date. | Conditional; AS MOO must exempt Use Limited Resources and hydro-electric facilities | No comments | The SCP project is on track and further implementation details will be provided.                    |
| No comments | Conditional; extensive efforts need to be justified; should be done prior to Convergence Bidding; schedule is too aggressive | Conditional; need to assess SLIC changes   | No comments | No comments | Conditional; concerned about robustness and capability of the market systems and software; would appreciate more public communication on software changes | Opposes; identified several design concerns and implementation questions.    | Supports; no impact   | No comments | The ISO is re-evaluating the effort to properly implement and test Multi-Stage Generation Modeling. |

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|-------------|---|---|--|--|---|-------------|--|--|---|
| No comments | Conditional; requires successful scaling of DR program                                      | Supports; agrees with design and scope                                  | No comments  | Opposes; premature due to policy design paper not being updated  | Conditional; Must first implement an effective DR program to mitigate price spikes; no time to enroll sufficient DR resources | No comments | Opposes; must resolve dependencies with DR initiative                  | No comments  | The stakeholder process for Scarcity Pricing will resume on 8/31/2009.                                |
| No comments | Opposes; Concerned about implementation ability of nodal design                             | Opposes; discouraged with implementation delay and lack of transparency | Opposes; strenuously objects delay in schedule; views lack of communication as demonstration that ISO does not view it as a priority | Concerned and disappointed with delay; ISO should pursue all avenues to implement according to FERC direction. | Conditional; must solve market issues and anomalies before an implementation plan can be committed                            | No comments | Opposes; large resource cost and performance degradation               | Opposes; opposes any delay in implementation; ISO should be expeditious in seeking FERC filing; ISO should move as fast as possible on open policy issues. | The ISO is working to resolve technical challenges and hopes to bring in the implementation schedule. |
| No comments | Supports; should be combined with Scarcity Pricing; Requests clarification on PDR products. | No comments   | No comments  | No comments  | Conditional; achievable if no prohibition to direct bid-in DR. May need to address concerns from CPUC proceedings             | No comments | Opposes; PRD and Participating Load refinements need to be concurrent. | No comments  | The ISO is reviewing the dependencies between Scarcity Pricing and DR.                                |