

## Stakeholder Process: 2012 GMC Rate Design

### Summary of Submitted Comments

**Stakeholders submitted six rounds of written comments to the ISO on the following dates:**

- Round one, 4/21/10
- Round two, 10/8/10
- Round three, 12/13/10
- Round four, 1/13/11
- Round five, 2/8/11
- Round six, 3/1/11

**Stakeholder comments are posted at:** <http://www.caiso.com/281a/281ac7f165ad0.html>

**Other stakeholder efforts included:**

- In-person meetings with discussion papers for rounds one, two and three
- Conference calls with discussion papers for rounds four, five and six
- One-on-one calls during late November, January and February

Management Proposal	Southern California Edison	Powerex	Dynegy	PG&E	SDG&E	MID/SVP	NCPA	CDWR	Management Response
Overall design	Support Meets criteria	Support Meets criteria	Support Meets criteria	Support Meets criteria	Support Meets criteria	Support Meets criteria	Support Meets criteria	Support Meets criteria	Noted

Management Proposal	Southern California Edison	Powerex	Calpine	PG&E	Midway Sunset	Management Response
Excluding certain specific generation contracts from system operations	Oppose Proposal is not acceptable and should be either eliminated or cut to two years	Support Useful transition	Support Narrowly focused on impacted generation contracts	Support Narrowly focused on impacted generation contracts	Support Narrowly focused on impacted generation contracts	Transition with least impacts to participants. Initial cost shift approximately \$2.5 million per year, diminishes as contracts expire

Management Proposal	Southern California Edison	SDG&E	CCSF	CDWR	NCPA	SVP/MID	Management Response
Implementing separate charge for transmission ownership rights	Support Meets criteria	Support Meets criteria	Support Meets criteria	Support Meets criteria	Support Meets criteria	Support Meets criteria	Noted

Management Proposal	Edison Mission Marketing	DC Energy	PG&E	DB Energy	EMTRI	Mercuria	Management Response
Use of congestion revenue rights auction bid fee of \$1	Support There should be a transaction charge and \$1 is appropriate	Support There should be a transaction charge and \$1 is appropriate	Support There should be a transaction charge and \$1 is appropriate	Support There should be a transaction charge and \$1 is appropriate	Oppose Charge too high should be \$0.005 per bid	Oppose Charge too high should be \$0.005 per bid	Participants that will pay over 50% of congestion revenue rights charges under the proposed fee structure support a \$1 bid fee. The \$1 per MW basis equates to a lower cost than the \$0.005 market bid fee. There are around 500,000 bids and a fee of \$0.005 would only raise \$2,500 - rendering the use of the fee pointless.

Management Proposal	CMUA	Powerex	PG&E	SCE	Management Response
Revenue requirement cap for 3 years at \$197M for 2012 and increasing to \$199M in 2013 and 2014	Support Acceptable proposal	Support Acceptable proposal	Support Acceptable proposal	Support Acceptable proposal	Changed from previous proposal to address stakeholder concerns