

## **Stakeholder Comments Template**

Submitted by	Company or Entity	Date Submitted
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Please use this template to provide your comments on the 2015 Grid Management Charge (GMC) Update Final Proposal located at: <u>http://www.caiso.com/informed/Pages/StakeholderProcesses/Budget-</u> <u>GridManagementCharge.aspx</u>.

Stakeholders should use this template to submit comments and or suggestions. Please submit written comments no later than close of business on Tuesday May 20, 2014 to <u>gmc@caiso.com</u>. Comments will be posted on the ISO website.

Comments are due by close of business Thursday, May 27, 2014.

ISO seeks written stakeholder comments on its 2015 GMC Update Final Proposal located at:

http://www.caiso.com/informed/Pages/StakeholderProcesses/Budget-GridManagementCharge.aspx.

Stakeholders should use this Template to submit written comments and or suggestions. Written comments should be submitted no later than Close of Business on Tuesday May 27, 2014 to: <u>gmc@caiso.com</u>. Comments will be posted on the ISO website.

The subject areas upon which ISO seeks stakeholder input are the following:

1. <u>Please comment on the 2015 GMC Update final proposal for the percentages</u> for the three GMC service categories and the rates for the Energy Imbalance market administrative charge and Transmission ownership rights charge.

CAISO's May 12, 2014 2015 GMC update showed 71% for the Systems Operations Maximum, but the May 20, 2014 call indicates 70%. Is this the final percentage value or just a result of rounding numbers?

## 2. <u>Please comment on the 2015 revenue requirement maximum and period to</u> which is applies.

CDWR does not see support for an increase to the annual revenue requirement, besides CAISO's substantiation that the increase is below the CPI. CAISO has a decreasing cost of capital figure which appears to be



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offset by an equivalent increase to their O&M budget without evidence of software or program development on par with the major software and program costs experienced due to the start of MRTU. EIM is sharing an existing system and purportedly "paying its own way". Renewables integration and ramping has been addressed with Flexible Ramping Constraint and the restart of the Flexible Ramping Product stakeholder initiative. CDWR is not opposed to a long term cap or to a reduction in CAISO's Bundled rate.

3. Other

The Activity Based Costing (ABC) that is used by CAISO is somewhat generalized, is there a more detailed or transparent source of information on CAISO stakeholder initiatives beyond levels and activities?