

Stakeholder Comments Template

Submitted by	Company or Entity	Date Submitted
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ISO seeks written stakeholder comments on its 2015 GMC Update Discussion Papers located at: <http://www.caiso.com/281a/281ac7f165ad0.html>

Stakeholders should use this Template to submit written comments and or suggestions. Written comments should be submitted no later than Close of Business on Thursday April 24, 2014 to: gmc@caiso.com. Comments will be posted on the ISO website.

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

1. Please comment on the 2015 cost of service update, the use of ABC and the allocations into the 3 GMC service categories including the TOR and EIM Fees.

Current 2012 GMC structure was developed by CAISO based on the ABC cost of service study and became effective January 1, 2012. The 2012 GMC structure will expire on December 31, 2014. Therefore, CAISO has to develop a new GMC structure or adopt the 2012 GMC as the 2015 GMC structure. CAISO continues using the ABC methodology to map and allocate activity costs into three service categories. The percentage of allocation of the activity costs will be changed for System Operations and CRR Services. CAISO proposes to modify the allocation and reduce the TOR charge rate as an administrative fee in 2015 GMC structure. CDWR supports CAISO's effort for updating the current 2012 GMC to the 2015 GMC structure.

CAISO proposes to include EIM and PIRP charge rates as administrative fees into 2015 GMC structure. The PIRP charge rate doesn't include any explanation or calculation. CDWR requests CAISO to include a calculation of the PIRP charge rate in next proposal.

2. Please comment on the 2015 revenue requirement maximum and period to which is applies.

It would be helpful if CAISO would supply additional justification for this increase other than the statement that it is a minor increase.

3. Other