

**Comments of the Centralized Forward Capacity Market Advocates
on the CAISO's 5-year Roadmap and
Draft Straw Proposal for Scoping Future Market Releases
September 25, 2007**

The California Forward Capacity Market Advocates (CFCMA) is composed of five member companies that have joined together to advocate for a timely implementation of a centralized forward capacity market in California. Included within CFCMA are: FPL Energy, NRG Energy, Reliant Energy, San Diego Gas & Electric Company (SDG&E), and Southern California Edison Company.

A Centralized Capacity Market (CCM) is an important, interdependent feature of the CAISO's market redesign and technology upgrade ("MRTU") that must be part of the CAISO 5 year Roadmap. The CFCMA members wish to emphasize the importance of CAISO's timely implementation of the CPUC's decision in the Phase 2 Track 2 proceeding.

Based on CFCMA's understanding of the CPUC's Phase 2 Track 2 procedural schedule, the CAISO should expect the CPUC to issue its Decision in the January 2008 timeframe, after careful consideration of comments from the CAISO and stakeholders. Accordingly, the members of CFCMA request that the CAISO make plans now to update the Roadmap no later than February 2008 to incorporate the CPUC's Decision. It is critical that the CAISO put this important market design feature in its planning and budgeting forecasts such that it will not be delayed by implementation/software or other resource constraints once the CPUC's decision has been issued.

The CAISO's timely implementation of the CPUC's Decision will depend on the CAISO setting the stage for the requisite level of staff support and commitment as well as CAISO Management leadership to oversee the design, tariff development and FERC filing as well as the parallel efforts of system design, development, testing and implementation. The CFCMA member companies and resources stand ready to assist the CAISO in revising the Roadmap upon the CPUC's issuance of the Phase 2 Track 2 decision.