

From: Bruce Bleiweis [mailto:bleiweis@dc-energy.com]
Sent: Wednesday, October 23, 2013 6:34 PM
To: Stakeholder Initiatives Catalog; Market Design
Cc: Kuhn, Tyler
Subject: 2013 Stakeholder Initiatives Catalogue

DC Energy appreciates the opportunity to provide CAISO staff the following comments on the Stakeholder Initiatives Catalog, section 6 on Congestion Revenue Rights issues.

Section 6.1 is the section currently regarding an 'Economic Methodology to Determine if a Transmission Outage Needs to be Scheduled 30 Days Prior to the Outage Month'. DC Energy suggests this section either be modified to examine, in general, outage notification requirements or a new section be included in this regard. DC Energy suggests outage reporting should be done in a manner to maximize the information known to CRR auction market participants while recognizing that some outages (emergency, etc) cannot be known in advance. In other ISO/RTOs there are more distinct/specified rules on outage reporting requirements, including notice of such known outages up to one year in advance. DC Energy suggests more discussion and ultimately changes resulting in more advance notice on many (but not all, size and duration matters) should be implemented.

Section 6.2 and 6.4 includes discussion on longer term CRRs (beyond one year). DC Energy suggests CAISO and its stakeholders discuss and implement a plan to move to CRR auctions greater than one-year. Section 6.4 is labeled as discretionary, however perhaps CAISO create another category as 'FERC Encouraged' and section 6.4 fall into such category.

Section 6.3 is entitled 'Insufficient CRR Hedging'. DC Energy suggests the scope be modified to include a process whereby after the end of the annual CRR auction participants are allowed, in subsequent auctions, to submit bids/offers for any remaining months in the current year as well as any block of months (strips) in the current year.

Please let me know if any additional information is needed on this submittal.

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