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These comments on Congestion Revenue Rights (CRR) issues are being submitted in response to the request for comments made at the February 27, 2007 meeting on CRRs

A key issue, in the seasonal, monthly AND long-term CRR allocation process is the adequacy of Trading Hub CRRs.

Another important issue is the process for CRR transfers for load migration.

A critical outcome of the instant process is that there be adequate trading hub CRRs available for allocation to LSEs and that the CRR trading hub issues are resolved such that LSEs will be permitted to receive allocation of trading hub CRRs during the long-term allocation process.

The ISO has proposed various solutions to the problem of insufficient CRRs at the Hubs. One of these proposals must be adopted and the problem alleviated. We are more concerned that the problem be alleviated than we are about which solution is used. However, any solution that changes the definition of the trading hubs seems problematic and a hindrance to confidence in the wholesale market.

Due to a lack of available time since these comments were requested, we were not able to submit more detailed comments at this time. We hope to provide more comments at a later time.

Thank you for the opportunity to provide comments.

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for Energy Users Forum

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