

Stakeholder Comments Template

Subject: E-Tag Timing Requirements

Submitted by	Company	Date Submitted
Dean MacGregor (813)301-4923 Mike Danielson (813)301-4906	Gila River Power	10/30/09

This template has been created for submission of stakeholder comments on the following topics covered in the October 20th Market Notice regarding E-tagging. Upon completion of this template please submit (in MS Word) to etagtaming@caiso.com. Submissions are requested by close of business on **November 4, 2009**.

Please submit your comments to the following questions for each topic in the spaces indicated.

1. What comments do you have relating to issues identify in the Issue Paper dated October 22, 2009, or other issues relating to determining physical Day Ahead schedules?

The e-Tagging Issue Paper explains that the reason for the proposed change in scheduling requirements is to ensure prudent and reliable grid operations. During the October 28th conference call, CAISO staff told participants that over 95% of DAM market awards are already being tagged before 1500 on the day before delivery. Since this change to CAISO scheduling requirements would impact just a few transactions, a cost-benefit assessment should be conducted before other work is performed. As a next step, Gila River recommends that CAISO provide estimated implementation costs for each of 4 options presented on slide 6 of the October 28th presentation. Implementation costs should include product development, systems changes, FERC filing expenses and any other costs. If this effort competes for the same resources that CAISO has working on its critical projects, the impact on those projects should be provided.

In addition, Gila River recommends that CAISO provide an analysis of the improvement in grid operations that would be achieved with this change. For this change to be effective in improving grid reliability, are other changes necessary. For example, would firm transmission be required for e-Tags for DAM market awards? What would the requirements be for DAM market awards for flow on Sunday, Monday and the day following NERC holidays? Are there any seams issues with other transmission providers in the WECC. Are there any known issues with WECC operating procedures in place or in development? If this change in scheduling procedures causes an adverse impact on market liquidity, could fewer CAISO bids in the DAM cause an adverse impact to grid reliability?

2. What comments do you have regarding maintaining the status quo (Option 1)?

See comments above in #1 above.

3. What comments do you have regarding timing requirement with reporting (Option 2)?

NERC INT-008 requires tags at T-20. Would CAISO report to this requirement? Or would CAISO report to a requirement at 1500 day-ahead? Would Option-2 entail a change to the CAISO tariff?

4. What comments do you have regarding timing requirement with financial implications (Option 3)?

What financial implications are under consideration?

5. What other solutions would you recommend to resolve issues in number 1 above with no change to the E-Tag Timing Requirement (Option 4)?

Any solution that improves grid reliability should be evaluated by CAISO. Gila River requests that CAISO ensures that this project does not interfere with other grid reliability and customer management activities.

6. What comments do you have with the stakeholder timeline?

Gila River hopes that CAISO reaches a solution on this issue in the fastest and most cost effective manner.

7. Others?

CAISO should contact PJM & other ISO's to learn about their e-Tagging requirements and share the findings with this working group.