### **Stakeholder Comments Template**

### **Subject: E-Tag Timing Requirements**

Submitted by	Company	Date Submitted
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This template has been created for submission of stakeholder comments on the following topics covered in the October 20<sup>th</sup> Market Notice regarding E-tagging. Upon completion of this template please submit (in MS Word) to etagtiming@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?

WPTF would like further information related to the impacts of the CAISO establishing its own tagging timelines on the business transactions and on other Balancing Authorities in the West. For example, if the CAISO established a tagging deadline of 3 pm the day before, would that mean that the CAISO expects the counterparties of all SCs of the CAISO to have full tagging information available at that time? If not, what does it mean for the CAISO to establish an earlier tagging requirement? WPTF would also like this issue broadened to address requirements associated with "implicit virtual bidding". This stakeholder process should clarify what specifically the CAISO requires with respect "implicit virtual bidding" such as whether there are certain transactions that are disallowed and if so, what the specifics associated with those transactions are.

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

WPTF does not have a specific position at this time but rather seeks clarification and further discussion as described under #1 above.

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

WPTF does not have a specific position at this time but rather seeks clarification and further discussion as described under #1 above. In addition, please provide clarification on what the implications would be of the report to the FERC. For example, would the CAISO report that the certain SCs had in some way conducted themselves in

appropriately by having missed the tagging deadline? What other ramifications would accompany such reporting?

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

WPTF seeks clarification and further discussion as described under #1 above. In addition, WPTF wishes the CAISO to clarify what it would mean to "reverse a market participants position in HASP", and WPTF seeks more detail on what the specific rule would be.

## 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)?

See items under #1 for areas where WPTF seeks further clarification.

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

The timeline seems too short, especially given the potential that any change on the part of the CAISO will impact business transactions and scheduling in WECC but outside of the CAISO.

#### 7. Others?

(Submit Comments Here)