

Margaret,

I sent you some earlier questions about the intent of this round of comments. With more clarity we may be able to submit more specific comments. For the time being, however, WPTF believes that the ISO must make as a priority addressing the FERC mandated items. There are several items that have been mandated by FERC that were not labeled as such. Even if the R1a/2 or subsequent road map may not yet recognize them as software initiatives, even consideration of policies – as mandated by FERC should be given a priority.

Items that do not seem identified by the ISO as committed to FERC by the ISO FERC mandated include the following:

Interface between SLIC and SIBR (paragraph 244 Sept Order)

Ancillary Service Substitution (paragraph 297 of Sept Order)

Sales of CRRs in the Auction (paragraph 831 of Sept Order)

Competitive Path Assessment Seasonally (within 12 months of startup) (Sept Order paragraph 1031)

Consideration of a full Hour Ahead Settlement Market (Sept Order paragraph 201 – and footnote 570)

Dynamic pivotal supplier test for market power mitigation (September order footnote 570)

Multi-settlement market for Ancillary Services (September order footnote 570)

Consideration of an alternate screen for market power in generation pockets (September order paragraph 1032).

We feel strongly that these issues must be a priority. We also expect that there will be residual implementation cleanup items from the MRTU that are not yet anticipated from the roll out of R1 of MRTU.

WPTF very much encourages the ISO to convey the degree among the non-FERC mandated items must be traded off. Upon doing so it will be much easier to focus on those items that have not yet been mandated by FERC.

Please let us know if you need additional information on any of the aspects of these comments.

Thank you for your consideration.

Sincerely,

Ellen