

**Stakeholder Process:**  
**Decision on Credit Policies affecting Congestion Revenue Rights**

**Summary of Submitted Comments**

**Stakeholders submitted three rounds of written comments to the ISO on the following dates:**

- Round One, 8/28/2009
- Round Two, 9/15/2009
- Round Three, 11/23/2009

An additional opportunity for comments was offered on 10/12/2009, but no comments were received.

**Stakeholder comments are posted at:** <http://www.caiso.com/2403/24037c20669e0.html>

**Other stakeholder efforts include:**

- Conference calls:
  - 8/21/2009
  - 10/5/2009
  - 11/16/2009
  - 3/10/2010
- In-person meetings:
  - 9/8/2009

Management Proposal	Stakeholders Stating Support	Stakeholders Stating “Do Not Object” or “Do Not Oppose”	Stakeholders Stating “Neutral”	Management Response
Calculation of maximum credit exposure of a CRR bid using the same MW value for the total credit requirement.	DC Energy, PG&E, Powerex, SCE, SDG&E, Silicon Valley Power (SVP):  <b>Support</b>	CPUC Staff:  <b>Do Not Oppose</b>		
Reduce pre-auction credit requirement for a negatively-valued CRR bid, by excluding negative bid (but not the credit margin) in the calculation. (As described by the ISO, this involves using the auction winning value to meet the holding credit requirement for the CRR.)	DC Energy, PG&E, Powerex, SCE, SDG&E, SVP:  <b>Support</b>  SCE requests the associated BPM and settlement charge code updates as soon as they become available, particularly the structure of the account to contain withheld CRR auction revenues, how revenues will be released to CRR holders, and how that account will be linked to a CRR holders overall collateral position.			Management will provide the requested BPM and settlement charge code updates as soon as they become available
Reduce the minimum credit requirement in the monthly CRR auction from \$500,000 to \$100,000.	CPUC Staff, Powerex, SCE, SDG&E:  <b>Support</b>	PG&E:  <b>Do Not Object</b>	DC Energy, SVP:  <b>Neutral</b>	
Other Issues			SVP proposes an enhancement to allow netting between allocated and auctioned CRRs in the holding credit requirement calculation, at the earliest possible opportunity. SVP requests an estimated timeline for considering this upgrade.	As SVP notes, the ISO indicated in the draft final proposal that this feature will require considerable changes to the current software, and cannot commit to a specific plan at this time. However the ISO will consider this comment and other stakeholder suggestions further in the future.