Integrated Balancing Authority Area ("IBAA") Comments of the Modesto Irrigation District ("MID")¹

April 28, 2008

In response to the California Independent System Operator Corporation's ("CAISO") April 21 and April 24, 2008 Market Notices, concerning the CAISO's IBAA proposal, MID submits the following statement:

MID supports the comments being submitted today to the CAISO by the Transmission Agency of Northern California ("TANC") and the Sacramento Municipal Utility District ("SMUD"). TANC's and SMUD's comments address, *inter alia*, what the CAISO has described as the "Draft Final" IBAA Proposal, and MID concurs with TANC's and SMUD's comments. MID also has reviewed, and generally concurs with the concerns regarding the "Draft Final" IBAA Proposal, submitted by the City and County of San Francisco, the Western Area Power Administration, the City of Santa Clara, California, doing business as Silicon Valley Power, the Turlock Irrigation District and the U.S. Department of Energy, Berkeley Site Office.

MID submits these comments in the spirit of open discussion, and reserves the right to change its position on the above matters in the future, as well as reserves the rights to comment on any other issue in this process.