

## **Stakeholder Process: Dropping the DEC Bidding Rule**

### **Summary of Submitted Comments**

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

- February 15, 2008 – *“Initial Stakeholder Comments on the DEC Bidding Rule”*
- March 24, 2008 -- *“Stakeholder Comments on Straw Proposal on the DEC Bidding Rule”*
- April 30, 2008 – *“Stakeholder Comments on Revised Straw Proposal on the DEC Bidding Rule”*

**Stakeholder comments are posted at:** <http://www.caiso.com/1fb1/1fb184c166370.html>

**Other stakeholder efforts include:**

- MSC Meeting and discussion – February 8, 2008
- Systems Interface User Group Conference Call – March 12, 2008
- Stakeholder Conference Call – March 17, 2008
- Stakeholder Conference Call -- April 21, 2008

<b>Management Proposal</b>	<b><u>A</u> California Public Utilities Commission Staff</b>	<b><u>B</u> Dynegy</b>	<b><u>C</u> Pacific Gas &amp; Electric Co. (PG&amp;E)</b>	<b><u>D</u> Powerex Corp.</b>	<b>Management Response</b>
Switch off the DEC Bidding Rule upon MRTU Start-up	Support	Support	Support  CAISO should also review how other ISOs address potential DEC gaming issues.  CAISO also should establish a formal milestone to review with stakeholders actual DEC market behavior during the first year of MRTU operation.	No technical or policy concerns	

<b>Management Proposal</b>	<b><u>E</u> San Diego Gas &amp; Electric Co. (SDG&amp;E)</b>	<b><u>F</u> Southern California Edison (SCE)</b>	<b><u>G</u> Western Power Trading Forum (WPTF)</b>	<b><u>H</u> Citigroup Energy Inc. (CEI)</b>	<b>Management Response</b>
Switch off the DEC Bidding Rule upon MRTU Start-up	Support	Support  SCE supports eliminating the current DEC bidding activity rule for the start-up of MRTU. The current rule will not prevent the gaming concerns it was trying to address, and it may have the perverse result of actually making the real-time market less competitive than simply eliminating the current rule.	Support  The DEC Bidding Rule should be removed from the MRTU tariff and systems prior to MRTU start-up.	Support	