

Template for comments

Please use the template below to submit comments to the CAISO. Comments are due by close of business Monday, November 29, 2010 to gmc@caiso.com.

Stakeholder Comments Template

Subject: 2012 GMC Cost of Service Straw Proposal

Submitted by (Name and phone number)	Company or Entity	Date Submitted
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ISO seeks written stakeholder comments on its 2012 GMC Cost of Service Straw Proposal Paper located at: <http://www.caiso.com/281a/281ac7f165ad0.html>

Stakeholders should use this Template to submit written comments and or suggestions. Written comments should be submitted no later than Close of Business on Monday, November 29, 2010 to: gmc@caiso.com. Comments will be posted on the ISO website.

The subject areas upon which ISO seeks stakeholder input are:

1. Please comment on the billing determinants listed in the straw proposal paper, and suggest any others you believe should be considered.

The California Department of Water Resources State Water Project (SWP) welcomes this opportunity to submit comments specific to the 2012 Grid Management Charge Straw Proposal published by the CAISO on November 11, 2010. SWP's current comments are based upon its understanding of the straw proposal and the December 18, 2010 CAISO 2012 GMC teleconference call. In following the guiding principles used by the CAISO, SWP wish to bring attention to the following billing determinants that appears to have been omitted from the list presented in Section B.1. for the Market Services proposal. Inclusion of the following billing determinate will enable the list in Section B.1. to maintain consistency with the examples presented in the straw proposal and in the December 18 teleconference call.

Market Services

- Generation dispatch energy
 - ✓ Real-Time Instructed Imbalance Energy (IIE)
 - ✓ Real-Time Uninstructed Imbalance Energy (UIE)
2. Please comment on the options the ISO has described for the billing determinants for allocating charge codes to users. Please describe any other options you believe should be considered.

At this time, SWP does not have additional comments to the options presented. However, SWP does request the CAISO to consider the inclusion of a table that correlates the billing determinate

being proposed to the CAISO Settlement Charge Code being used. SWP believes that this will assist with the SC validation process for these proposed GMC chargers.

SWP also awaits the publication by the CAISO of the bill impact studies for each SC under the proposed GMC rate design and reserve future comments upon review of the study results.