

Stakeholder Comments Template
Subject: GMC Charge Code 4537 – Market Usage
Forward Energy Final Proposal

Submitted by (Name and phone number)	Company or Entity	Date Submitted
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CAISO seeks written stakeholder comments on its GMC Charge Code 4537 – Market Usage Forward Energy Final Proposal, which was posted on October 2, 2009 at <http://www.caiso.com/2417/2417891c4ad50.html>

Stakeholders should use this Template to submit written comments. Written comments should be submitted no later than Close of Business on Monday, October 12, 2009 to: csnay@caiso.com. Comments will be posted on the CAISO website.

The CAISO seeks stakeholder input on the following:

1. Do you support the ISO's final proposal to change the market usage forward energy charge calculation to:

Max [abs(Generation+Imports),abs(Load+Exports)]

Calpine supports the final proposal as reasonably related to cost causation while avoiding the unintended consequences of both the current method and the proposed "Option 1" netting proposal.

Calpine continues to support the CAISO intention to move to a gross billing determinant at the next opportunity, which appears to be in the 2011/2012 timeframe.