

**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
Bonnie Blair 202-585-6905	Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, CA (“Six Cities”)	October 12, 2009

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](mailto: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)]

COMMENT ON BEHALF OF SIX CITIES:

Yes, if the ISO intends to propose any change from the current method for calculating the charge. FERC has determined previously that the net calculation method currently in effect is just and reasonable, and the Six Cities would prefer to retain that method. The “greater of” method also seems reasonable, however, and the Cities would not oppose it. The Six Cities do oppose application of a gross calculation method, which clearly would be unreasonable if applied to both sides of a transaction when an SC schedules the use of its own resources to serve its load.