

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

<b>Submitted by (Name and phone number)</b>	<b>Company or Entity</b>	<b>Date Submitted</b>
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CAISO seeks written stakeholder comments on its GMC Charge Code 4537 – Market Usage Forward Energy Straw Proposal, which was posted on August 28, 2009 at <http://www.caiso.com/23f1/23f1eeab40a20.html>

Stakeholders should use this Template to submit written comments. Written comments should be submitted no later than Close of Business on Friday, September 4, 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 straw proposal to eliminate ISTs from the MUFE calculation? Please explain why.

Six Cities take no position on this question.

2. If you do not support removing ISTs from the MUFE calculation, what alternative do you propose? Please explain why your alternative is preferable to the ISO's straw proposal.

N/A

3. Do you support the ISO's straw proposal to continue netting physical energy in the MUFE calculation? Please explain why.

Yes, the Six Cities support the ISO's proposal to continue netting physical energy in the MUFE calculation. First, the netting approach previously has been accepted by FERC as just and reasonable. Second, applying the MUFE charge to gross schedules would impose excessive, unjust, and unreasonable charges on Scheduling Coordinators that are simply scheduling the use of their own resources to serve their own loads. Imposing

the MUFEE charge on both sides of what is effectively a single transaction would be unjust and unreasonable and inconsistent with cost causation.

4. If you do not support the netting option, what alternative do you propose? Please explain why your alternative is preferable to the ISO's straw proposal.

N/A