

# Stakeholder Comments on CRR Issues

Submitted by (name and phone number):	Company or entity:	Date Submitted:
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The CAISO is requesting initial written comments on the various CRR-related issues discussed at the April 1, 2008 stakeholder meeting. This template is offered as an easy guide for entities to submit comments; however, any participant should feel free to submit comments in any format. Submitted comments will be posted on the CAISO website unless participants expressly ask that their comments not be posted.

The Issues Papers and presentations discussed at the April 1 CRR Stakeholder meeting are posted at: <http://www.aiso.com/1b8c/1b8cdf25138a0.html>

**Stakeholder comments should be submitted by close of business on Tuesday, April 8, 2008 to: [CRRComments@caiso.com](mailto:CRRComments@caiso.com)**

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The CAISO offers the following questions as a structure for stakeholder comments:

## A. CRR Year 2 Release Process

1. Does your company or entity have comments or suggestions on the historical reference period for verifying Season 1 source nominations in the next annual CRR release process?

*Anaheim believes that Tiers 1 and 2 allocations in the annual process should reflect expected uses of the grid. Therefore, we believe the historical reference period should be changed to calendar year 2007 in order to better reflect expected uses of the grid.*

2. Does your company or entity have comments or suggestions on whether CRR Seasons 2 and 3 should be treated as “Year 1” or “Year 2” seasons?

*Since the original allocations will not be effective, Anaheim believes that the 2009 allocations for those seasons should be treated as "Year 1" seasons. In addition, we believe the historical reference period should also change, as stated in response to the first question, to calendar year 2007.*

3. Does your company or entity have any comments about the treatment of LT-CRRs?

*Anaheim favors starting over with the LT-CRR allocation process for Tiers 2 and 3 (and Tier 4 if MRTU is delayed to 2009) based on the new 2009 annual allocations as proposed in answer to question 2.*

#### **B. CRR MW Granularity**

4. Please indicate the MW granularity that your company or entity prefers for 2009 CRRs:

- a. 0.1 MW granularity
- b. 0.01 MW granularity
- c. 0.001 MW granularity

If possible, please explain the business reasons for your preference.

*Anaheim believes that a 0.001 MW granularity would be fairer to all LSEs by providing smaller LSEs with more of what they are entitled to from the trading hubs. Based on the example provided by the CAISO, it appears that Anaheim could have been adversely impacted by the current allocation rules.*

#### **C. 30-Day Rule on Outage Scheduling**

5. Does your company or entity have comments or concerns about changing the 30-Day Rule to allow exemptions within a 24-hour period?
6. Does your company or entity have any further comments about exemptions to the 30-Day Rule?

#### **D. Monthly CRR Eligibility for LSEs Without Verifiable Load Forecasts**



12. Please comment on the proposed Tariff clarification to increase credit requirements for CRRs due to extraordinary circumstances such as extended outage or other circumstances that could dramatically change the risk profile of a CRR.
  
13. Does your company or entity have comments on the concept for requiring corporate parent credit backing of affiliated market participants' Estimated Aggregated Liability? Is there merit in this potential change? Should this concept apply to other forms of collateral, or just guarantees? Would this concept present regulatory difficulties for affected entities?

**F. Other CRR Issues**

14. Does your company or entity have further comments or suggestions on these various CRR issues?