

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

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 Does your company or entity have comments or suggestions on the historical reference period for verifying Season 1 source nominations in the next annual CRR release process?

Since 2006 was used for historical reference for Seasons 2, 3 and 4, Riverside requests that the CAISO use 2006 for verifying Season 1.

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?

Riverside strongly urges that Seasons 2 and 3 be treated as Year 2 as originally planned.

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

No comments.

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. 0.001 MW granularity
 - c. 0.001 MW granularity

Riverside requests that granularity stay at the current tenths of megawatts.

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?

No comments.

6. Does your company or entity have any further comments about exemptions to the 30-Day Rule?

No comments.

D. Monthly CRR Eligibility for LSEs Without Verifiable Load Forecasts

7. Please indicate and explain any preference how the CAISO should determine monthly CRR eligibility for an LSE in the absence of load forecasts:
 - a) Use load data from the last five relevant months
 - b) Use load data from the immediate previous month
 - c) Use load data from the same month of the previous year
 - d) Other suggestions?

No comments.

E. CRR Credit Policy Enhancements

8. What is your entity's view on the proposed options to mitigate the credit risk of CRR transfers associated with load migration as discussed in the CRR Credit Issue Paper?

Regarding questions 8 thru 13: Riverside supports policies outlined in CRR Credit Policy Enhancements, especially 4.3.3 as outlined in question 13.

9. What is your entity's view regarding enhancing the credit requirement calculation for holding Short-Term CRRs?
10. Please comment on the CAISO's intent to re-file the full-term credit coverage for LT-CRRs with the proposed modified credit requirement calculation formula.
11. What is your entity's view on whether to enhance the bidding requirement for auction participation? Should the full Credit Margin, or a portion of the Credit Margin be included in the bidding requirements? If a portion of the Credit Margin is preferred, what is your entity's suggestion on the appropriate percentage?
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?

No comments.