

## Stakeholder Comments Template

### Subject: 2012 Grid Management Charge

Submitted by (name and phone number):	Company or Entity:	Date Submitted:
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DC Energy submits these very brief comments on the CAISO 2012 Grid Management Charge (GMC) final proposal. These comments simply supplement and support comments DC Energy provided in December 2010 and February 2011. DC Energy believes the CAISO staff has done an excellent job process wise to reach this conclusion and final proposal. Such process started well in advance of the proposed January 1, 2012 implementation date and staff provided participants detailed explanation throughout (i.e., in its meeting materials, during the scheduled meetings as well as off-line one-on-one). This, well in advance process, was especially important as the 2012 GMC includes a new charge for CRR participants. DC Energy has throughout supported the CAISO's Guiding Policy and Ratemaking Principles (i.e., Cost Causation, Focus on use of ISO services, not market behavior, Transparency, Predictability, Forecastability, Flexibility and Simplicity).

DC Energy presently participates in both the convergence bidding and CRR markets and believes: (a) market participants should bear an appropriate share of the GMC costs applicable to the markets in which they participate (as they share in the benefits of these markets); and (b) the rates proposed, while significant, are not overly onerous.