

Stakeholder Comments Template

GMC 2012 Comments

Submitted by	Company	Date Submitted
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DC Energy appreciates the ability to present these limited comments on the proposed modification to the 2012 Grid Management Charge Straw Proposal Grandfathering Provision as presented on the February 8th Stakeholder Call. DC Energy does not oppose the grandfathering provision presented, however there was one alternative suggested that DC Energy does oppose.

Specifically the grandfathering proposal would exempt a limited number of generating units (that meet specific/limited criteria) from the System Operations charge until the first opportunity to renegotiate the contract or until the contract expiration. DC Energy is not a generation owner and does not benefit from this proposed modification. DC Energy agrees with the CAISO determination that the affect on the remaining participants that pay the System Operations charge will be extremely small compared to the extremely large impact that would be placed on a small number of participants and therefore does not oppose this limited exemption. One participant on the call suggested that the amount of dollars that result from this exemption should be spread across all market participants. DC Energy opposes such socialization as it is contrary to cost causation principles that CAISO has determined an important principle in this cost allocation re-design and would further impact the large increase that certain participants (i.e., CRR holders) are absorbing with the 2012 GMC structure.