

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

<b>Submitted by (Name and phone number)</b>	<b>Company or Entity</b>	<b>Date Submitted</b>
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1. Do you support the ISO's final proposal to change the market usage forward energy charge calculation to:

Max [abs(Generation+Imports),abs(Load+Exports)]

Yes. Direct Energy supports this compromise proposal as an interim solution until the CAISO implements new rates that follow cost causation principles. Direct Energy understands that the CAISO plans to conduct a new cost of service study in 2011 and implement such new rates in 2012.