

EPIC Merchant Energy appreciates the opportunity to submit comments on the Revised White Paper: Release of 2009 CRRs and Start-up of MRTU Markets 26-Aug-2008.

With the continued uncertainty surrounding the MRTU implementation date, EPIC requests that the CAISO consider the following items when setting CRR schedules:

1. Bidding on CRRs is risky because system topology changes over time. Data and information become less exact with an increase in time. Timeframes for submitting CRR bids should be as close to the CRR auction start date as possible. EPIC is concerned that the CAISO will not release revisions to the full network model in sufficient time to study for the November 2008 auction.
2. Many companies that participate in the CAISO's markets also participate in other ISO/RTO markets. Each of these markets requires the posting of collateral when bidding on FTRs or TCCs. Therefore, posting collateral in multiple markets places an onerous requirement on many companies. CAISO should ensure that the timing for posting collateral, clearing the market, and returning any unused collateral, is accomplished in the shortest time possible.

The issues described above are significant to a well functioning CRR market and would impact the amount of participation in the CRR market. For the two reasons above, if the tentative MRTU Go Live date of February 1, 2009 is delayed, the date of the yearly CRR yearly auction must be moved forward by the same amount of time.

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