

Template for comments

Please use the template below to submit comments to the CAISO. Comments are due by close of business Thursday, October 21, 2010 to gmc@caiso.com.

Stakeholder Comments Template **Subject: 2012 GMC Cost of Service Straw Proposal**

Submitted by (Name and phone number)	Company or Entity	Date Submitted
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LDES believes that the \$1 CRR bid charges are excessive and unreasonable due to the following reasons:

1. All the other ISOs either don't charge a bid fee or charge bid fee but in the range of several cents per bid. CAISO's proposal of \$1 is way above the industry standards.
2. For DAM load and generators, the bid fee is only \$0.005. CRR bid fee is unfairly high comparing to that standard.
3. The proposed \$1 CRR bid charges will dramatically discourage the participation of the current CRR market. For example, LDES's charges will increase 7000% which is unreasonable by any standard.
4. Reduced market participation would dry up liquidity and would not promote efficient competitive marketplace. This may lead to other market power issues.

LDES strongly urges CAISO to reconsider its \$1 CRR bid charges and follows other ISOs' standard as a reference.