

Stakeholder Comments Template

Subject: E-Tag Timing Requirements

Submitted by	Company	Date Submitted
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This template has been created for submission of stakeholder comments on the following topics covered in the October 20th Market Notice regarding E-tagging. Upon completion of this template please submit (in MS Word) to etagtaming@caiso.com. Submissions are requested by close of business on **November 4, 2009**.

Please submit your comments to the following questions for each topic in the spaces indicated.

1. What comments do you have relating to issues identify in the Issue Paper dated October 22, 2009, or other issues relating to determining physical Day Ahead schedules?

MID understands the issues that the CAISO outlined in its October 22 whitepaper and encourages the CAISO to foster an open and meaningful Stakeholder Process in order to address these issues, especially the issues which will be brought on by the implementation of Convergence Bidding.

2. What comments do you have regarding maintaining the status quo (Option 1)?

MID believes that the status quo may be viable as long as virtual bids at the interties are clearly distinguished from bids which can be traced back to generation either within or outside the CAISO's BA. However, there should be a rule implemented which would identify and eliminate the "implicit virtual bidding" activities which were identified in the CAISO's whitepaper.

3. What comments do you have regarding timing requirement with reporting (Option 2)?

MID would need to understand more fully what the reports the CAISO may submit to the FERC would accomplish before commenting positively or negatively on this option. While MID has always strived to conform to the CAISO Tariff as well as WECC Business Practice Standards and NERC/WECC Reliability Standards, care must be taken if a "deadline" is established for e-Tag submittal. MID has experienced difficulties in the past in identifying

accurate tagging paths, especially when multiple purchasing and selling entities are involved. IF a deadline were to be established, it should be late in the business day, i.e. 1600 or 1700 in order to give the LSE responsible for submitting a tag plenty of time to identify all PSEs involved in any transaction.

4. What comments do you have regarding timing requirement with financial implications (Option 3)?

MID has concerns with this option. MID has the same comments for this option as in Option 2 above. Additionally, MID believes penalties should not be levied to entities which experience true force majeure events.

5. What other solutions would you recommend to resolve issues in number 1 above with no change to the E-Tag Timing Requirement (Option 4)?

See answer to question #2 above.

6. What comments do you have with the stakeholder timeline?

See answer to question #3 above.

7. Others?

MID has hopes and concerns that whatever option the CAISO and stakeholders (hopefully) agree to does not adversely impact those entities that currently strive to abide by the CAISO Tariff and WECC Standard Business Practices and NERC/WECC Reliability Standards.