

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

Submitted by (Name and phone number)	Company or Entity	Date Submitted
Tony Zimmer 916-781-4229	Northern California Power Agency (NCPA)	October 12, 2009

CAISO seeks written stakeholder comments on its GMC Charge Code 4537 – Market Usage Forward Energy Final Proposal, which was posted on October 2, 2009 at <http://www.caiso.com/2417/2417891c4ad50.html>

Stakeholders should use this Template to submit written comments. Written comments should be submitted no later than Close of Business on Monday, October 12, 2009 to: csnay@caiso.com. Comments will be posted on the CAISO website.

The CAISO seeks stakeholder input on the following:

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)]

Northern California Power Agency (NCPA) does not support the CAISO's final proposal. NCPA continues to believe the existing allocation methodology used in production is just and reasonable, and is better aligned with a market participant's use of the forward energy market. The CAISO's final proposal to change the market usage forward energy charge calculation to a maximum of generation and imports or load and exports does not properly reflect a market participant's use of the forward energy market.