

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
Gifford Jung 604-891-6040	Powerex Corp.	Oct. 9, 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)]

Powerex supports the CAISO final proposal as a reasonable interim measure that takes into account cost causation but also mitigates the rate impact on certain SC's.

However, Powerex believes that the CAISO should re-visit the design of this charge during the CAISO's next Rate Case and verify whether a charge based on "gross market usage" more fully takes into account basic rate design principles.