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
Greg Bass (619) 684-8199 and Harry Singh (203) 897-5571	RBS Sempra Commodities ¹	October 12,2009

1. <u>Do you support the ISO's final proposal to change the market usage forward energy charge calculation to:</u>

Max [abs(Generation+Imports),abs(Load+Exports)]

Yes. RBS Sempra Commodities supports this calculation as a compromise. While the proposed calculation does not follow full cost causation principles, it is a step in that direction. RBS Sempra Commodities is willing to support this calculation for an interim period until the CAISO conducts a new cost of service study and implements new rates in 2012.

 $^{^1}$ RBS Sempra Commodities is the marketing name for Sempra Energy Solutions LLC, a CAISO Load Serving Entity and Sempra Energy Trading LLC, a wholesale energy marketer.