

**Stakeholder Comments Template**  
**Subject: GMC Charge Code 4537 – Market Usage Forward**  
**Energy Discussion Paper**

Submitted by	Company	Date submitted
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1. Which of the options listed in the whitepaper as a potential change to the structure of the Market Usage Forward Energy GMC Charge Code do you support?

RBS Sempra Commodities, which is the marketing name for Sempra Energy Solutions LLC, a CAISO Load-Serving Entity and Sempra Energy Trading LLC, a wholesale energy marketer, appreciates the CAISO's efforts to address concerns about applying the Market Usage Forward Energy (MUFE) charge to Inter-Scheduling Coordinator Trades (IST). As RBS Sempra Commodities understands the proposal in the White Paper, the CAISO would no longer apply the MUFE charge to ISTs. Once the CAISO's proposal is implemented (either option), the only charge applied to ISTs would be the current IST administrative fee, charge code 4512, Forward Schedule IST. RBS Sempra Commodities supports the CAISO's recommended approach, The CAISO simply provides after-the-fact accounting for ISTs and there is no rational basis for applying the MUFE charge code to these activities as is done today.

Both options proposed by the CAISO address the concerns about ISTs and either option would be an improvement over the current structure. Of the two options, the second appears preferable and more consistent with cost causation principles because it treats all market participants equally, regardless whether they represent Loads, Generation Suppliers or a combination of both. However, a final decision on preferences among the two options depends on the magnitude of the charge under each option. It would be helpful to market participants if the CAISO could provide an estimate of the magnitude of the charge under each option to assist further stakeholder discussions. RBS Sempra Commodities looks forward to continued discussion and quick resolution of this issue.

2. If none of the options presented in the whitepaper are supported, do you have an alternative proposal?

N.A.