

Stakeholder Comments Template

Subject: GMC Charge Code 4537 – Market Usage Forward Energy Discussion Paper

| Submitted by (Name and phone number) | Company or Entity | 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?

San Diego Gas & Electric Company (SDG&E) prefers Option 1 of the two alternatives recommended by the CAISO for revision of the calculation of the Market Usage sub-function of the Forward Energy scheduling service (MUFE) Grid Management Charge described in Charge Code (CC) 4537 of the Business Practices Manual Configuration Guide. Excluding all Inter-Scheduling Coordinator Trade (IST) transactions from the MUFE charge will tend to encourage the use of additional ISTs between parties on an on-going basis who otherwise may forgo this opportunity due to the current cost obligation. A change to the first option is simple to implement and retains the concept of net-energy cost causation that is currently the basis for CC 4537. The second option offered by the CAISO is somewhat more complicated and departs from the existing formula adopted by the participants for netting generation, load, imports and exports.

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

SDG&E does not propose an alternative proposal but will consider other options that may be offered by other parties providing comments regarding the MUFE calculation.