

SDG&E comments originally received in email format from Tiff Nelson

SDG&E provides these comments on options for FTR / CRR Contingencies to accommodate a delay in the MRTU Go-Live Date

For a Pre-summer MRTU Go-Live date, the ISO should offer monthly renewal of FTRs using the most market-based approach that can be implemented for the given lead time. For April 2008, a simplified approach that allows March 2008 FTR holders to renew their March 2008 FTR position for one month at the March 2008 price is acceptable if no auction can be implemented. Any subsequent months should be offered to all market participants through an auction process. The ISO will have to confirm FTR path quantities for each month.

For a Post-Summer MRTU Go-Live date, the ISO should offer a block of months that span the summer months to the MRTU Go-Live month to all market participants via an auction. The starting month in this block would follow the last month of the monthly FTR process from above.

SDG&E can support the ISO's Revised Contingency Plan of 1/22/08 for CRRs.