

**Sempra Generation Stakeholder Comments:
Revised Flexible Ramping Product Straw Proposal
December 12, 2011**

Submitted by	Company	Date Submitted
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Sempra Generation appreciates this opportunity to provide the following comments regarding the Revised Flexible Ramping Product Straw Proposal, issued by the CAISO on November 29, 2011. Sempra Generation provided comments on the November 1, 2011 initial straw proposal recommending against cost allocation of Flexible Ramping costs to generators that have contracted their plant output to load serving entities, without a mechanism to recover the Flexible Ramping costs. The revised proposal removes this cost allocation approach and instead allocates flexible ramping costs to loads, while providing a high level breakdown of the costs associated with loads and generation. The revised proposal also provides for the option of a transfer of the Flexible Ramping cost obligation through an inter-scheduling coordinator trade, if parties so choose. Sempra Generation supports this revised cost allocation approach.