

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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CAISO seeks written stakeholder comments on its GMC Charge Code 4537 – Market Usage Forward Energy Discussion Paper, which was posted on August 3, 2009 at <http://www.caiso.com/docs/2002/08/02/2002080216283419989.html>.

Stakeholders should use this Template to submit written comments and or suggestions. Written comments should be submitted no later than Close of Business on Monday, August 10, 2009 to: csnay@caiso.com. Comments will be posted on the CAISO website.

The subject areas upon which CAISO seeks stakeholder input are:

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

Shell Energy supports Option #2. We believe that this option more accurately reflects GMC charges incurred and divides the costs more equitably amongst all SC's. Option #1 does not produce an accurate charge based on an SC's true impact on GMC costs, since gross volume is not considered. For example, a company that schedules a very large amount of mw's onto the grid may end up paying significantly less GMC's than a small company that has a much more minimal impact on ISO management costs. Conversely, option #2 will assign GMC costs based on the true magnitude of an SC's impact on forward scheduling and market usage costs.