

## Template for comments

Please use the template below to submit comments to the CAISO. Comments are due by close of business Monday, November 29, 2010 to [gmc@caiso.com](mailto:gmc@caiso.com).

### **Stakeholder Comments Template** **Subject: 2012 GMC Cost of Service Straw Proposal**

<b>Submitted by (Name and phone number)</b>	<b>Company or Entity</b>	<b>Date Submitted</b>
Ken Kohtz (408) 615-6676	City of Santa Clara, California d/b/a Silicon Valley Power	November 24, 2010

ISO seeks written stakeholder comments on its 2012 GMC Cost of Service Straw Proposal Paper located at: <http://www.caiso.com/281a/281ac7f165ad0.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, November 29, 2010 to: [gmc@caiso.com](mailto:gmc@caiso.com). Comments will be posted on the ISO website.

The subject areas upon which ISO seeks stakeholder input are:

1. Please comment on the billing determinants listed in the straw proposal paper, and suggest any others you believe should be considered.

The City of Santa Clara, California, doing business as Silicon Valley Power ("SVP") thanks the California Independent System Operator Corporation ("CAISO") for the opportunity to submit comments concerning the CAISO's 2012 Grid Management Charge ("GMC") Straw Proposal.

If the CAISO goes forward with allocating a portion of GMC costs directly to CRR Holders, SVP supports the CAISO proposal to use allocated or auctioned CRR MW multiplied by the applicable hours as the billing determinant for apportioning most CRR-related costs. Further, SVP requests that the CAISO clarify its CRR bid transaction fee proposal. The CAISO explains that this "fee will apply to the CRR nominations and the CRR allocations processes. The rate of \$1.00 will be used for this fee." Straw Proposal at p. 10. It is not immediately clear to SVP whether the CAISO's proposal to allocate a dollar for every CRR auction bid applies to a single bid, or whether a CRR Entity could be charged more money if it submits multi-segment auction bids. SVP believes that the same charge should apply to single bids or multi-segment bids, based on cost causation principles (i.e., the cost to the CAISO of applying multi-segment bids is not likely to be a linear function of the number of bid segments).

2. Please comment on the options the ISO has described for the billing determinants for allocating charge codes to users. Please describe any other options you believe should be considered.

No comments on this issue at this time.