

September 7, 2012

**COMMENTS ON BEHALF OF THE CITIES OF ANAHEIM, AZUSA, BANNING,  
COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA REGARDING  
THE REVISED DRAFT TARIFF LANGUAGE FOR THE  
CENTRAL COUNTERPARTY EXCEPTION FOR SELF-SUPPLY FROM  
GENERATION FINANCED BY TAX-EXEMPT DEBT**

In response to the ISO's request, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the "Six Cities") submit the following comments regarding the revised draft Tariff language for the proposed Central Counterparty Exception for Self-Supply from Generation Financed by Tax-Exempt Debt (the "Revised Tariff Language") circulated by the ISO on September 4, 2012.

The Six Cities maintain their full support for the proposed exception from the Central Counterparty provisions as set forth in the Revised Tariff Language. The Revised Tariff Language is consistent with the objectives for the proposed Central Counterparty Exception for Self-Supply from Generation Financed by Tax-Exempt Debt and will maintain the benefits of the proposed exception identified by the ISO and discussed in the Cities' comments submitted on August 29, 2012. The Six Cities reiterate their appreciation for the ISO's willingness to work constructively to address concerns regarding private use restrictions applicable to facilities funded by tax-exempt debt and support prompt implementation of the exception as embodied in the Revised Tariff Language.

Submitted by

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