

From: [Alberter, Mark](#)
To: [eTag Timing](#)
Cc: [Alberter, Mark](#)
Subject: Re: ISO e-Tag proposal comments
Date: Thursday, November 05, 2009 7:32:46 AM

Thank you for the opportunity to address this issue. The conference call on October 28th was informative. Though many questions remain, SMUD does support further exploration of this issue.

During the conference call, the participant from PWX offered many concise comments with which I am in agreement. Here are other comments I would like to offer:

- Following the WECC preschedule calendar, all schedules/awards should be tagged the day they are traded.
 - As was mentioned, 95% of schedules follow this rule – why can't the other 5%?
 - Can we get examples of why the 5% cannot be tagged prior to the HASP.
- If an opportunity exists for gaming the system at the expense of reliability, that opportunity must be shut down immediately.
- It is a concern that implied virtual bidding may be occurring prior to the convergence bidding market and the ISO's ability to identify physical vs. financial trades.
 - Will the fees the market participants may avoid with this practice be put upon other participants in any way?
- It may be that same day tagging may be the only way the ISO can be sure the DA physical energy award has a way to come to the load in real time.
 - If participants are waiting for just in time transmission before they can tag, how reliable can that energy really be.

I look forward to further stakeholder participation on this issue.

Thank you,

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