

# Stakeholder Comments on CRR Issues

Submitted by (name and phone number):	Company or entity:	Date Submitted:
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The CAISO is requesting initial written comments on the various CRR-related issues discussed at the April 1, 2008 stakeholder meeting. This template is offered as an easy guide for entities to submit comments; however, any participant should feel free to submit comments in any format. Submitted comments will be posted on the CAISO website unless participants expressly ask that their comments not be posted.

The Issues Papers and presentations discussed at the April 1 CRR Stakeholder meeting are posted at: <http://www.aiso.com/1b8c/1b8cdf25138a0.html>

**Stakeholder comments should be submitted by close of business on Tuesday, April 8, 2008 to: [CRRComments@caiso.com](mailto:CRRComments@caiso.com)**

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The CAISO offers the following questions as a structure for stakeholder comments:

## A. CRR Year 2 Release Process

1. Does your company or entity have comments or suggestions on the historical reference period for verifying Season 1 source nominations in the next annual CRR release process?

Use more recent period such as 2007.

2. Does your company or entity have comments or suggestions on whether CRR Seasons 2 and 3 should be treated as “Year 1” or “Year 2” seasons?

Treat them as “Year 2” seasons.

3. Does your company or entity have any comments about the treatment of LT-CRRs?

#### **B. CRR MW Granularity**

4. Please indicate the MW granularity that your company or entity prefers for 2009 CRRs:
  - a. 0.1 MW granularity
  - b. 0.001 MW granularity
  - c. 0.001 MW granularity

If possible, please explain the business reasons for your preference.

#### **C. 30-Day Rule on Outage Scheduling**

5. Does your company or entity have comments or concerns about changing the 30-Day Rule to allow exemptions within a 24-hour period?
  
6. Does your company or entity have any further comments about exemptions to the 30-Day Rule?

#### **D. Monthly CRR Eligibility for LSEs Without Verifiable Load Forecasts**

7. Please indicate and explain any preference how the CAISO should determine monthly CRR eligibility for an LSE in the absence of load forecasts:
  - a) Use load data from the last five relevant months
  - b) Use load data from the immediate previous month
  - c) Use load data from the same month of the previous year
  - d) Other suggestions?



13. Does your company or entity have comments on the concept for requiring corporate parent credit backing of affiliated market participants' Estimated Aggregated Liability? Is there merit in this potential change? Should this concept apply to other forms of collateral, or just guarantees? Would this concept present regulatory difficulties for affected entities?

**F. Other CRR Issues**

14. Does your company or entity have further comments or suggestions on these various CRR issues?