

Stakeholder Comments: Commitment Cost Enhancements Phase 3 (CCE3)

Submitted by	Company	Date Submitted
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Wellhead appreciates the opportunity to provide comments to the CAISO's CCE3 straw proposal. At this time, Wellhead supports the CAISO's straw proposal and believes it should provide a reasonable tool to manage use-limitations as defined. Wellhead's previous hesitation to support the use of future power prices in the opportunity cost methodology has been addressed by CAISO by constraining the conversion factors to a minimum of 1.