

**From:** Doug Davie [ddavie@wellhead.com]

**Sent:** Friday, March 06, 2009 5:39 PM

**To:** Standard Capacity Product Mailbox

**Cc:** McDaniel, Grant; Salvagno, Ken

**Subject:** SCP for RA Comments

Wellhead is providing these brief comments on the 2/27 version of the Draft Final Proposal for a Standard Resource Adequacy Capacity Product. Wellhead continues to support the development of a competitive market and products/services therein. However, as proposed by the CAISO, the Standard Resource Adequacy Capacity Product is a very different product that current Resource Adequacy which makes it incompatible with existing commercial arrangements that provide Resource Adequacy.

Our comments and concerns with the SCP have been previously expressed and are not repeated herein. The CAISO should not forge ahead with its plans to ask the FERC to approve a CAISO tariff that will interfere with pre-existing agreements between third parties. SCP must either be acknowledged to be a different product from RA that is currently part of the CAISO tariff or the SCP must account for the adverse impacts the Standard Resource Adequacy Capacity Product will have on existing suppliers of RA.

We hope the CAISO will not disappoint its stakeholders by ignoring significant issues and problems that have been raised by stakeholders.