

Western Area Power Administration comments on CAISO's 2012 GMC Straw Proposal

Western Area Power Administration, Sierra Nevada Region appreciates the opportunity to provide the following comment.

The CAISO is proposing to assess the \$1000 GMC monthly charge to the SCs that have no market activity during the trade month. This charge (charge code 4575) is designed to recover the CAISO's costs associated with Settlements, Metering, and Client Relations. However, The CAISO's new proposal is contrary to cost causation principles. When a SC ID is inactive during the trade month, the SC does not have any settlement statements, does not submit meter data and does not require client relations support for that trade month. Therefore, Western recommends that the CAISO scrap that portion from its 2011 proposal.