

**Western Power Trading Forum Comments on
Exceptional Dispatch tariff language**

June 16, 2008

The Western Power Trading Forum Offers two brief but important comments regarding the draft tariff language.

Note that while WPTF offers some specific comments herein, neither these comments nor the absence of other comments should be interpreted to reflect WPTF's endorsement of the Exceptional Dispatch tariff language.

1. The CAISO uses the terminology "supplemental revenues". The CAISO should remove this terminology. While there is a very limited instance when the \$24/MWh bid adder to the default energy bid would apply in itself this does not necessarily represent supplemental revenues relative to the supplier's bid. The balance of the tariff provisions simply address market revenues and mitigated payments. We suggest a phrase such as "bid-based revenues". Otherwise the language and the tariff section headings suggest suppliers are receiving revenues they would otherwise not be entitled to when in fact they are simply receiving the higher of their bid price or the LMP just as they would in any of the CAISO's other markets.

2. The CAISO has modified sections 34.9 and 34.9.1 such that the CAISO is no longer obligated to use market based bids before going outside of the markets. This is unacceptable. There is absolutely no basis for the CAISO to forego using resources that have submitted bids and instead use resources that have not submitted bids.

Please let me know if you have questions.

Thanks for your consideration.

Sincerely,
Ellen

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