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**Sent:** Monday, March 30, 2009 9:50 PM  
**To:** crrdata  
**Subject:** WPTF Comments on CRR Credit Requirements

WPTF appreciates the opportunity to provide input on the CAISO's process to reevaluate credit requirements. WPTF offers the following comments.

- WPTF is very supportive of the CAISO's intention to ensure sufficient collateral exists to protect market participants from defaults.
- The CAISO should have a clearer description of the model they will use to come up with the expected values of the CRRs under extraordinary conditions. While WPTF is supportive the concept generally, the CAISO's current proposal suggests that the methods may be overly complex, difficult for the CAISO to implement, and difficult for SCs to mirror for estimation purposes.
- The CAISO's processes, including the types information used to arrive upon collateral values under normal and extraordinary conditions, should be very transparent and known to all market participants. WPTF does not believe that the CAISO's treatment of extraordinary collateral requirements should lead to a reduction in transparency.

WPTF encourages more discussion on this issue and the CAISO's further creative thinking on how to make the collateral determinations feasible and transparent.

Please contact me if you have any questions or would like further input.

Sincerely,  
Ellen

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