

Margaret,

These comments are submitted on behalf of the Western Power Trading Forum (WTPF) and reflect aspects of MRTU design issues that are included in the Road Map. WTPF as a consortia will not be providing a ranking of individual items at this time, and will instead ask you to turn your attention to the comments of individual members for the purposes of ranking on non-Mandated items. However, I will offer some qualitative comments regarding which items should require ranking.

First, the WPTF members and I especially appreciate the consideration of our earlier comments to include, or re-characterize several of the FERC-mandated items.

In these comments, however, we will reiterate comments not incorporated in your latest draft related items that the CAISO has already conveyed to FERC that it intends to compete related to MRTU (Item 1, below) as well as address FERC related items corresponding to Road Map items modified in the CAISO's latest draft.

1. Full Hour-Ahead Settlement, the Dynamic Pivotal Supplier Test for Market Power Mitigation, and a Multi-Settlement Market for Ancillary Services: the CAISO has committed to FERC that it will address these issues, and FERC has acknowledged this commitment in its September 2006 MRTU Order (footnote 570)
2. Economic modeling to exempt 30-day notification (Item 2.2.3.30) – This should be a FERC- Committed item unless the CAISO plans to not exempt any outages from 30-day notification in the absence of the development of the economic criteria. The FERC filing of the exemption relies upon this process.
3. Regional Scarcity Pricing – The CAISO added item 2.5.5 related to Scarcity Pricing. FERC already mandated Scarcity Pricing within 12 months of startup. The CAISO does not have the authority to delay by means of a stakeholder ranking, scarcity premiums. This is not an item that requires voting to be addressed in Release 1A.

We take seriously the commitments the CAISO has made to FERC in past filings and the CAISO's response to FERC mandated items and we believe the integrity of the CAISO's past and future FERC filings depend on the CAISO fulfilling on these commitments. We further remind the CAISO that items recognized by FERC cannot be disregarded simply because of a stakeholder ranking of other design items that are not pre-existing FERC commitments.

Please let me know if you have questions.

Thanks for your renewed consideration on these remaining FERC – committed items.

Sincerely,
Ellen

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