To: CAISO
From: Steven Kelly
         IEP

IEP appreciates the opportunity to comment on the CAISO Issue Paper related to the Aliso Canyon Electric Gas Coordination effort. We recognize the unique nature of the Aliso Canyon situation and interim nature of the proposed solution(s) pending resolution of the associated reliability concerns. However, as the issues that arise from the Aliso Canyon matter may persist for some time, IEP believes that whatever structures are put in place be fair; just and reasonable; and, sufficient to solve the problem.

We look forward to reviewing and commenting as needed on the CAISO's Straw Proposal which is expected to have a greater level of specificity. At this point, IEP does not have any specific proposals to forward nor any specific comments on the ideas presented by the CAISO in its Issue Paper other than to note the following:

- **Information transparency in the forward time-frame is helpful, but may not be sufficient.** Making available information in the forward time-frame (e.g. running a 2-day forward "advisory" mkt) may be fine, but this may not solve the fuel availability/reliability/cost-recovery problem that is manifest in real-time.
- **Need for Clear and Transparent Protocols Detailing the Allocation of Roles and Responsibilities between the Gas Company and the CAISO.** Clear and transparent Protocols are necessary related to who is doing what, when with regards to coordination between CAISO and SoCalGas.
- **"In-Market" Solutions are preferred over "Out-of-Market" solutions.** Solutions to address the Aliso Canyon electric and gas coordination issue (and associated grid reliability concerns) should be embedded into the market to the extent practical, rather than be treated outside the market (e.g. through Exceptional Dispatch).
- **Electric Generators should be afforded reasonable, up-front assurance of full cost recovery of natural gas transportation and balancing costs that derive from CAISO "out-of-market" dispatch instruction.**

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