

We would like to add two comments relating to all issues revolving around aggregation and cost shifting to the VRET chart based on the following order:

ORDER NO. 00-596

(9) “Direct access” means the ability of a retail electricity consumer to purchase electricity and certain ancillary services directly from an entity other than the distribution utility.

(10) “Direct service industrial consumer” means an end-user of electricity that obtains electricity directly from the transmission grid and not through a distribution utility.

Additionally, we would like to advocate if there is any transition mechanism employed to recover stranded cost that the model developed would remain “neutral” and not by unintended consequences create a barrier to entry in the VRET market.

Respectfully Submitted;

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