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**Comments of Calpine Corporation
on the CAISO's Proposed Changes
to Generator Availability Reporting**

Calpine Corporation ("Calpine") appreciates the opportunity to comment on the proposed changes to Generator Availability Reporting. Our comments respond to the draft posted on May 7, 2008.

Calpine supports the CAISO conclusion that a "reasonable balance" must be struck between the benefits and costs of outage and reliability reporting. Specifically, we support the CAISO's conclusions that an extension of the reporting time from 30 to 60 minutes is reasonable. Additionally, Calpine supports the changes that allow the investigations trigger to be established only after one late-report per month.

However, Calpine continues to believe that the reporting megawatt ("MW") threshold should be revisited. The reduced burdens associated with less frequent reporting, particularly for larger units, would greatly benefit the operators of those units. Calpine proposes that the CAISO consider one of two possible alternatives. The first alternative is to raise the threshold to 20 MW for all units. While this may marginally increase the opacity of availability, it would certainly reduce the frequency of reporting substantially. Alternatively, the CAISO could establish a graduated limit that reflects the relative unimportance of very small changes in availability of large generators and also

recognizes that the CAISO has a transparent view of the status of all large generators. In particular, the CAISO could establish a reporting limit of the greater of 10 MW or 5 percent of Pmax. Such a limit could be part of the CAISO master-file.

Please do not hesitate to contact Rosemary Antonopoulos, Managing Counsel, with any questions on these comments.