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February 6, 2012

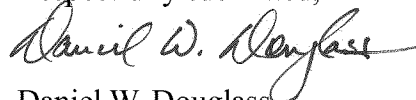
Mr. Honesto Gatchalian
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

**RE: Western Power Trading Forum Reply Comments to Draft
Resolution E-4471**

Dear Mr. Gatchalian:

The Western Power Trading Forum¹ (“WPTF”) offers the following brief reply comments in response to the opening comments filed by fourteen parties on January 31, 2012. Draft Resolution E-4471 (“DR”) has pulled together such disparate interests as all the utilities, all the retail choice proponents, the major customer groups, consumer advocates, the unions and all the generator trade associations. Each individual intervenor has its own justification in asking for the rejection but the essential fact is that there is widespread sentiment that the DR should be rejected. WPTF therefore recommends that the DR be rejected and that the Commission move forward with a careful focus on resolving the real issues of import, which should be to craft resource adequacy requirements and forward procurement rules that identify future needs, including integration needs, and provide durable, transparent market mechanisms to meet those future needs.

Respectfully submitted,



Daniel W. Douglass
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Counsel for the
WESTERN POWER TRADING FORUM

¹ WPTF is a California non-profit, mutual benefit corporation dedicated to enhancing competition in Western electric markets in order to reduce the cost of electricity to consumers throughout the region while maintaining the current high level of system reliability. WPTF actions are focused on supporting development of competitive electricity markets throughout the region and developing uniform operating rules to facilitate transactions among market participants.

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cc: All Commissioners
Ed Randolph, Director, Energy Division
Karen Clopton, Chief Administrative Law Judge
Frank Lindh, General Counsel
All parties on the service lists in R.10-05-006 and
R.11-10-023
Dawn Weisz, MEA
David Orth, SJVPA
Mike Campbell, CCSF
Robert Strauss, Energy Division
Nathaniel Skinner, Energy Division
Leslie E. Starck, Senior Vice President, c/o Karyn Gansecki - SCE