



Stakeholder Comments Template

Market Settlements Timeline

This template has been created for submission of stakeholder comments on the Revised Straw Proposal meeting that was held on August 22, 2019. The paper, stakeholder meeting presentation, and all information related to this initiative is located on the [initiative webpage](#).

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business **September 6, 2019**.

Submitted by	Organization	Date Submitted
<i>(submitter name and phone number)</i> Caroline Emmert	<i>(organization name)</i> ACES	<i>(date)</i> August 27/2019

Please provide your organization's comments on the following issues and questions.

ACES appreciates the opportunity to submit feedback and comments on CAISOs initiative to streamline the timeline for Settlements.

1. Modify settlements timeline

Please provide your organization's feedback on modifying the settlements timeline, as described in the Revised Straw Proposal. Please indicate Support, Support with caveats, Oppose, or Oppose with caveats. Please explain your rationale and include examples if applicable.

None at this time.

2. Extend flexibility in publishing settlements/weekly invoices

Please provide your organization's feedback on the proposal to extend flexibility in publishing settlements/weekly invoices, as described within the Revised Straw Proposal. Please indicate Support, Support with caveats, Oppose, or Oppose with caveats. Please explain your rationale and include examples if applicable.

None at this time.

3. Reduce administrative costs for low value disputes

Please provide your organization's feedback on the proposal for reducing administrative costs for low value disputes, as described within the Revised Straw Proposal. Please indicate Support, Support with caveats, Oppose, or Oppose with caveats. Please explain your rationale and include examples if applicable.

ACES is strongly opposed to the implementation of a threshold for dispute submittal. While \$100 may seem like a small amount in the grand scheme of things, to a smaller SC it can be significant. Additionally, just because the CAISO deems the dispute to be invalid, the reason behind the submission makes it valid to the SC.

When considering the validity of a dispute the needs of both sides of a dispute should be taken into consideration. Sometimes an SC has no other way of determining what is causing a variance than by submitting a dispute. This is especially true after major settlement changes in the market.

While the CAISO has stated that SC's may submit an Inquiry for these types of disputes, the danger here is that the result of the inquiry may have actually affected the whole market. An Inquiry may not catch that in time and the dispute deadline could be missed.

Additional comments

Please offer any other feedback your organization would like to provide on the Revised Straw Proposal.

None at this time.