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**Comments of Boston Energy Trading and Marketing LLC on
CAISO's Market Settlements Timeline Straw Proposal**

Boston Energy Trading and Marketing LLC ("Boston Energy") appreciates the opportunity to provide comments on the CAISO's Market Settlements Timeline straw proposal discussed on June 13, 2019. Boston Energy is supportive of the ISO's goals of improvement the quality of its settlements statements and shortening the overall settlements time horizon. In these comments Boston Energy asks the ISO to further detail the dispute process/window and asks the ISO publish to its public website CAISO wide \$/MWh rates that are assessed to Load Serving Entities.

Dispute Process Clarifications

In the final proposal Boston Energy requests the ISO provide clarity on the new dispute timelines for each of the required and optional statements. The final proposal should clearly state (1) what is disputable on each statement (i.e. all settlements or just changes from the prior), (2) when disputes for a given statement are due, (3) when disputes will be resolved, and (4) when placeholder disputes should be submitted and how they will be treated by the ISO. Clarity is crucial on these points given our experience with the rollout of the CRR Phase 1B project and the numerous market data and settlement issues that followed.

Transparency into CAISO Wide \$/MWh Rates

CAISO has numerous \$/MWh rates that are assessed to load serving entries for things such as ancillary services costs. Given the delay in releasing the initial settlement statement Boston Energy requests the ISO publish to its public website at T+3B a set of initial \$/MWh rates. These values can be based on ISO forecast load data. This information will help Load Serving Entities prepare initial estimates for their customers. To be clear Boston Energy is asking the ISO to publish CAISO wide rates only. Boston Energy is not asking the ISO to release any information that is specific to a market participant.

Submitted by,

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