



## 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](mailto:initiativecomments@caiso.com). Submissions are requested by close of business **September 6, 2019**.

Submitted by	Organization	Date Submitted
Camille Christen	Idaho Power Company	September 6, 2019

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

#### 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.

**Support.** Idaho Power Company ("Idaho Power") supports the changes to the settlement timeline. The status quo T+3B and T+12B statements often result in large swings in settlement amounts because settlement quality meter data and market price correction data may not be available for the T+3B statement, whereas it is available for the T+12B statement. Publishing the first statement when settlement quality meter data and market price correction data can be used will increase the accuracy of the statements and reduce unnecessary swings in settlement amounts. Idaho Power appreciates CAISO's proposal to allow additional time for the submission of meter data. Idaho Power also appreciates CAISO extending the dispute timeline to 22 days.

Idaho Power understands that CAISO is further analyzing the Estimated Aggregate Liability and credit impacts of the proposed timeline changes. Idaho Power looks forward to further considering the proposal once that analysis is available.

## 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.

No comments 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.

Oppose. Idaho Power strongly opposes the proposal to only consider settlement disputes for dollar amounts greater than \$100 (except for approved place-holder disputes). Idaho Power reiterates its prior comments on this issue.<sup>1</sup> As stated in those comments, it is Idaho Power's understanding that when a dispute is the result of a market solution defect, CAISO denies the dispute because it cannot re-run the market. The proposed limitation on disputes is concerning because even smaller dollar amount disputes may be indicative of market solution errors or other market issues. How many of denied disputes under \$100 were denied because there was a market solution defect, but the market could not be re-run (as opposed to being denied because the market ran properly and the dispute was otherwise invalid)?

Idaho Power also shares the concerns raised by San Diego Gas & Electric, Southern California Edison, and Pacific Gas and Electric in the August 19, 2019, stakeholder call. Commenters emphasized that settlements have to be accurate, and the ability to dispute any dollar amount is critical to ensuring accuracy. There were also concerns about the ability to establish placeholder disputes and that the CIDI inquiry process may not be appropriate as an alternative to a dispute in all cases.

CAISO's goal with this proposal is to reduce administrative burden for low dollar value disputes. However, each market participant should be allowed to determine, for itself, whether each individual dispute is worth submitting. CAISO should not unilaterally make that decision for all market participants via this proposal. CAISO should abandon the proposal to limit disputes to those greater than \$100.

### Additional comments

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

None.

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<sup>1</sup> Idaho Power Company's Comments on CAISO's Market Settlement Timeline Issue Paper and Straw Proposal at 4 (June 27, 2019), available at <http://www.caiso.com/Documents/IPCCComments-MarketSettlementTimeline-IssuePaper-StrawProposal.pdf>.