

**Portland General Electric Comments
on Straw Proposal for Market Settlement Timeline**

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Portland General Electric Company (“PGE”) appreciates the opportunity to provide comments on the straw proposal for Market Settlement Timeline (“straw proposal”). PGE looks forward to continuing to work with the ISO and fellow stakeholders on refining the Market Settlement Timeline in a way that allows for maximum efficiency in the Western Energy Imbalance Market (“EIM”). In its review of the straw proposal, PGE has identified some sections that cause concern or require clarification as outlined below.

Decreasing Required Statements – Sections 5.3.1 and 5.3.2 of the straw proposal

ISO, in their straw proposal seeks to re-align, consolidate, and extend the required settlement timeline by moving the days for required statements. PGE believes that ISO’s effort to improve the quality of initial statements by simply removing one of the required statements may not be completely effective. Many T+7B statements will still include estimated meter data and, thus, the first statement with actuals happens at T+60B. PGE appreciates and welcomes ISO’s efforts to improve accuracy and recognizes this may just be a first step.

It is also not ideal for an EIM Entity to wait 10 months after the T+60B statement, at which time the ISO may optionally publish a T+12M statement, to resolve disputes. It is preferred to settle disputes that have financial impacts for the EIM Entity and its customers as soon as possible.

Proposal to limit settlement disputes that ISO will consider – Section 5.3.3 of the straw proposal

While PGE appreciates ISO’s effort to decrease administrative costs by raising the minimum amount for disputes to \$100, PGE is concerned that this could lead to unintended consequences for other EIM Entities being settled. Currently, if an EIM Entity resubmits meter data, these corrections can see cascading impacts to other participants. Since PGE currently commits through its EIM business practice to pass on disputes to the ISO without a minimum dollar threshold, PGE thinks that this change might raise concerns for its customers.

PGE also seeks clarification on the following:

Will ETSR’s be settled on the T+7B?

Will LAP prices be final on the T+7B?

Will the T+60B statements be invoiced monthly like the T+55s? Or, daily like the current T+12s?

PGE appreciates the ISO’s consideration of their comments.