

## Stakeholder Comments

### **Local Market Power Mitigation Enhancements 2015, Straw Proposal Issued November 25, 2015**

Submitted by	Company	Date Submitted
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SDG&E appreciates the opportunity to comment on the Local Market Power Mitigation (LMPM) Enhancements 2015 Straw Proposal and stakeholder call. SDG&E supports efforts to improve market power mitigation but has some concerns about the implementation of the current proposal and would like more information before supporting integration of the proposed LMPM enhancements.

First, SDG&E anticipates the benefits of the updated LMPM method to be small. For that reason, SDG&E requests more information about the estimated time and costs of implementation for the proposed process enhancements. It would be helpful to have a better illustration of the investments necessary to incorporate the proposed enhancements.

Also, SDG&E would like to reiterate concerns voiced on the call about the impact of the proposed enhancements, specifically on a possible increase in DC market solutions. SDG&E requests more detail as to why the ISO believes implementing these enhancements will not increase DC solutions in the market optimization.